

MICHAEL J. GARCIA  
United States Attorney for the  
Southern District of New York  
By: JOSEPH N. CORDARO  
Assistant United States Attorney  
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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X		
FRANKLYN F. LUGO,	:	
	:	
Plaintiff,	:	08 Civ. 2960 (RJS)
	:	ECF Case
-against-	:	
	:	Electronically Filed
THE UNITED STATES OF AMERICA,	:	
	:	
Defendant.	:	
	:	
-----X		

**DECLARATION OF JOSEPH N. CORDARO IN SUPPORT  
OF THE GOVERNMENT'S MOTION FOR SUMMARY JUDGMENT**

I, JOSEPH N. CORDARO, pursuant to 28 U.S.C. § 1746, declare the following under penalty of perjury:

1. I am an Assistant United States Attorney for the Southern District of New York. I have been assigned to handle this case on behalf of defendant, the United States of America (the "Government"), and I am fully familiar with all the facts stated herein.

2. Annexed hereto as Exhibit A is a true and correct copy of the Administrative Appeal Record in this matter, and the Certificate of Completeness of Record of Proceedings Before Administrative Review Officer, certified by Courtney L. Wilkerson, Esq., on April 3, 2008.

3. Annexed hereto as Exhibit B is a true and correct copy of plaintiff Franklyn F. Lugo's summons and complaint in this action.

4. Annexed hereto as Exhibit C is a true and correct copy of the parties' stipulation, so-ordered by the Court on June 30, 2008, staying the disqualification of the Ivana Grocery Store, 1665 Topping Avenue, Bronx, New York 10457 ("plaintiff's store") from the Food Stamp Program (the "Program") until ten days after the Court rules on the Government's motion for summary judgment.

5. Annexed hereto as Exhibit D is a true and correct copy of Chapter 10 of the Food and Consumer Service Handbook 318.

6. Annexed hereto as Exhibit E is a true and correct copy of printouts from the web site [www.mapquest.com](http://www.mapquest.com) indicating the driving distance between plaintiff's store, and the following stores participating in the Program ("firms"):

- a. Pena Deli Grocery, 4298 Park Avenue, Bronx, New York 10457  
(0.77 miles)
- b. A Reyes Grocery Corp., 1725 Fulton Avenue, Bronx, New York 10457  
(0.52 miles)
- c. 1964 Grand Food Corp., 1964 Grand Concourse, Bronx, New York  
10457 (0.63 miles)

7. Annexed hereto as Exhibit F is a true and correct copy of printouts from the web site [www.mapquest.com](http://www.mapquest.com) indicating the driving distance between plaintiff's store and the following firms:

- a. Sahara African/Carribean Supermarket, 472 East Tremont Avenue, Bronx, New York 10457 (0.66 miles)
- b. Lucky 3<sup>rd</sup> Deli Grocery Inc., 531 East Tremont Avenue, Bronx, New York 10457 (0.75 miles)
- c. New York 99c Store Corp., 559-561 East Tremont Avenue, Bronx, New York 10457 (0.82 miles)
- d. Kolarc Inc., 1960 Bathgate Avenue, Bronx, New York 10457 (0.80 miles)
- e. Onstar Distributions Inc., 1971 Webster Avenue, Bronx, New York 10457 (0.64 miles)

8. Annexed hereto as Exhibit G is a true and correct copy of printouts from the web site [www.mapquest.com](http://www.mapquest.com) indicating the driving distance between plaintiff's store and the following firms:

- a. B J Food Corp., 309 East Burnside Avenue, Bronx, New York 10457 (0.72 miles)
- b. J D 248 Food Corp., 248 East 174<sup>th</sup> Street, Bronx, New York 10457 (0.22 miles)
- c. Tremont Meat Corp., 229 East Tremont Avenue, Bronx, New York 10457 (0.71 miles)

- d. 2096 Concourse Food Corp., 2096 Grand Concourse, Bronx, New York  
10457 (0.93 miles)

9. Annexed hereto as Exhibit H is a true and correct copy of a printout from the web site www.mapquest.com indicating the driving distance between plaintiff's store and the following firm:

- a. Western Beef Retail, Inc., 4269 Park Avenue, Bronx, New York 10457  
(0.85 miles)

Dated: New York, New York  
July 11, 2008

s/ Joseph N. Cordaro  
JOSEPH N. CORDARO  
Assistant United States Attorney  
Southern District of New York

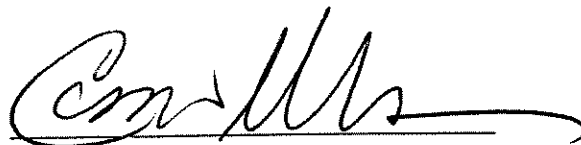


CERTIFICATE OF COMPLETENESS OF RECORD  
OF PROCEEDINGS BEFORE  
ADMINISTRATIVE REVIEW OFFICER

RE: IVANA GROCERY STORE  
BRONX, NY

The undersigned hereby certifies:

1. That as Chief of the Administrative Review Branch of the Benefit Redemption Division, he is the duly designated supervisor of Richard Havnen, the Administrative Review Officer who made the Final Agency Determination complained of in this action;
2. That in his position, he is the designated custodian of records in this matter;
3. That he has examined the administrative appeal record of Ivana Grocery Store, attached hereto as pages A.R. 1 through A.R. 172, and states that the attached is a true and correct copy of the said administrative appeal record, and of the record considered by Richard Havnen in upholding the decision of Gilda Torres, Food and Nutrition Service, to disqualify Ivana Grocery Store from participation in the Food Stamp Program for 1 year, as elaborated in his determination dated February 28, 2008. The SSN's, EIN's and DOB's were redacted to comply with the E-Government Act.



Courtney L. Wilkerson, Esq.  
Chief, Administrative Review Branch  
Benefit Redemption Division

Certified on this 3<sup>rd</sup> day of April 2008.

**Gilbert, LaShon**

---

**From:** Havnen, Richard  
**Sent:** Friday, March 07, 2008 4:27 PM  
**To:** Torres, Gilda; Gilbert, LaShon  
**Cc:** Self, Robin  
**Subject:** Ivanna Grocery Store, Bronx, NY - Receipt Date

This is to advise you that my determination letter in the subject case was received on 3/03/2008 at the subject firm.

RB # HQ [& Bksfld]: 01-033 [08-015]

TARS #: C0120265

FIRM NAME AND ADDRESS:

Ivanna Grocery Store

65 Topping Avenue

Bronx, New York 10457-7107

ACKNOWLEDGMENT LETTER DATE: 1/29/2008

SPECIFIC ADVERSE ACTION(S) UNDER REVIEW: Disq. 1 Year

FINAL DETERMINATION AND DATE: Sustained - 2/28/2008

UNITED STATES DEPARTMENT OF AGRICULTURE  
FOOD AND NUTRITION SERVICE

Administrative Review Branch

11000 Truchard Court

Bakersfield, CA 93312-6723

Tel. (661) 589-5465

---

February 28, 2008

RCVD MAR 03 2008

Subject: Ivana Grocery Store  
Bronx, New York  
Disq. - 1 Year

To: Gilda Torres, Officer in Charge  
Metro I New York Field Office

Attached is a copy of the determination letter in which I have recorded my findings after review of the subject case. It is my determination that the initial determination by your office to disqualify the subject store from participation in the Food Stamp Program for a period of one year is sustained.

Upon receipt of notification from the U.S. Postal Service, your office will be advised of the date that the addressee received my letter of determination.

The subject file is herewith enclosed.



Richard J. Havnen  
Administrative Review Officer

Attachment/Enclosure

cc: Courtney L. Wilkerson, Chief, ARB

UNITED STATES DEPARTMENT OF AGRICULTURE  
FOOD AND NUTRITION SERVICE

Administrative Review Branch

11000 Truchard Court  
Bakersfield, CA 93312-6723  
Tel. (661) 589-5465

February 28, 2008

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

7007 0710 0000 1747 8559

Franklyn F. Lugo, Owner  
Ivana Grocery Store  
1665 Topping Avenue  
Bronx, New York 10457-7107

Dear Mr. Lugo:

Enclosed is the Final Agency Decision of the U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS) in response to your request of January 16, 2008 for administrative review. Also included therein is a statement of your right to judicial review.

It is the decision of the USDA that there is sufficient evidence to support a finding that a one year period of disqualification was properly levied against Ivana Grocery Store, Bronx, New York.

Sincerely,

ORIGINAL SIGNED BY  
RICHARD J. HAVNEN

Richard J. Havnen  
Administrative Review Officer

Enclosure

cc: New York City, New York Field Office ✓  
bcc: Courtney L. Wilkerson, Chief, ARB

UNITED STATES DEPARTMENT OF AGRICULTURE  
FOOD AND NUTRITION SERVICE  
Administrative Review Branch  
11000 Truchard Court  
Bakersfield, CA 93312-6723

Ivana Grocery Store  
Bronx, New York

Appellant

V.

New York City, New York Field Office

Respondent

Case Number: C0120265

## FINAL AGENCY DECISION

It is the decision of the U.S. Department of Agriculture, Food and Nutrition Service (FNS), that there is sufficient evidence to support a finding that a one year period of disqualification was properly levied against Ivana Grocery Store, Bronx, New York, by the New York City, New York Field Office.

## ISSUE

The issue accepted for review is whether the Field Office took appropriate action, consistent with 7 C.F.R. § 278.6(e)(4), when it made the decision on January 9, 2008 to disqualify Ivana Grocery Store, Bronx, New York, for a period of one year.

## AUTHORITY

7 U.S.C. § 2023 and implementing regulations at 7 C.F.R. § 279.1 provide that “[A] food retailer or wholesale food concern aggrieved by administrative action under § 278.1, § 278.6 or § 278.7 ... may file a written request for review of the administrative action with FNS.

### **STATEMENT OF THE CASE**

The records presently before me show that the Department of Agriculture conducted a careful analysis of the electronic benefit transactions conducted by your store during the period June 2007 through August 2007.

Following this analysis, your store was administratively charged with Food Stamp Program trafficking violations by the Department in a letter dated November 6, 2007. You responded to those charges with a letter dated November 13, 2007 which was addressed to the New York City, New York Field Office of the Food and Nutrition Service.

After having given consideration to your reply, the Field Office notified you in a letter dated January 9, 2008 that the store would be disqualified from participation in the Food Stamp Program for a period of one year.

We then received your request of January 16, 2008 for an administrative review of that decision. With the granting of your request for review, implementation of the sanction has been held in abeyance pending completion of this review. In requesting administrative review, you have stated as your position in the matter that the disqualification of your firm will create a hardship to your business and that your firm provides a service to the community.

### **ANALYSIS AND FINDINGS**

In administrative proceedings involving disputes of regulatory actions or inactions, USDA assumes the responsibility of establishing a sufficient factual record to prove or disprove the allegations of the appeal. The record is then reviewed in light of the evidentiary standards and analytical frameworks established by various courts of law.

In appeals of adverse actions, an appellant bears the burden of proving by a clear preponderance of the evidence that the administrative actions should be reversed or otherwise amended. That means that the appellant has the burden of providing relevant evidence which a reasonable mind, considering the record as a whole, might accept as sufficient to support a conclusion that the matter asserted is more likely to be true than to be untrue.

Based on my review of the evidence in this case, there appears to be no question that program violations did, in fact, occur. As noted previously, the charges of violations are based on the findings of a formal Department of Agriculture analysis of electronic benefit transactions during the period in question. My review of the documentation has yielded no indication of error or discrepancy in the reported findings that the transactions in question cannot be explained as legitimate sales of eligible food items for immediate payment with Food Stamp Program benefit instruments.

While your firm was initially charged with trafficking in benefit instruments, the Field Office accepted as valid your contention that those questionable transactions were the result not of trafficking but rather of food stamp program recipient households having been allowed to use their benefit instruments to pay for previous purchases for which store credit had been extended. Pursuant to the provisions of 7 C.F.R. § 278.2(f), benefit instruments may not be accepted in payment for credit sales. To this it should be added that only store ownership and/or management might reasonably be construed to have the authority at a retail food store to approve any and all practices by a store with respect to offering credit and approving arrangements for payment thereof.

I have also considered whether it might be appropriate to impose a civil money penalty in this case in lieu of a period of disqualification. Such a finding is appropriate only if a store sells a substantial variety of staple food items and its disqualification would create a hardship to food stamp households because there is no other authorized retail food store in the area selling as large a variety of staple food items at comparable prices. It is recognized that some degree of inconvenience to Food Stamp Program benefit instrument users is inherent in the disqualification from the Food Stamp Program of any participating food store as the normal shopping pattern of such Food Stamp Program benefit instrument holders may need temporarily to be altered during the period of disqualification. In this case, the Field Office has rendered a finding pursuant to 7 C.F.R. § 278.6(f) that it would not be appropriate to impose a civil money penalty in lieu of a period of disqualification because of its determination that your store is not the only authorized retail food store in the area selling as large a variety of staple food items at comparable prices. Current program policy interprets 7 C.F.R. § 278.6(f) that if there is any comparable competing store within one mile, it must be considered as near enough that hardship will not be suffered by program households.

With regard to your contention that a one year period of disqualification will cause severe economic hardship to your firm, it is recognized that some degree of economic hardship is a likely consequence whenever a store is temporarily disqualified from participation in the Food Stamp Program. However, I must consider the interests of the program and fairness and equity not only to competing stores but also to those other participating retailers who are complying fully with program regulations. In addition, we must be fair to those other retailers who have been similarly disqualified from the program in the past for similar violations.

### CONCLUSION

My review has disclosed no sufficient basis for modification of the Department's initial decision in this matter. The earlier action is fully consistent with the provisions of 7 C.F.R. § 278.6(e)(4) which provides that FNS shall disqualify a firm for one year if it is to be the first sanction for the firm and the ownership or management personnel of the firm is responsible for violations and FNS had not previously advised the firm of the possibility of violations and their consequences. It is, therefore, my determination that the one-year period of disqualification of your store, as



imposed by the Food and Nutrition Service Field Office, is fair and proper. That action is sustained.

In accordance with the Food Stamp Act of 1977, and the regulations thereunder, this period of disqualification shall become effective thirty (30) days after your receipt of this letter. A new application for participation may be submitted ten (10) days prior to the expiration of this one-year period. In accordance with 7 C.F.R. § 278.1(b)(4), at the time of any such new application for program participation, you would be advised by the office receiving such an application of the necessity, as a store previously sanctioned for program violations, also to post a collateral bond or irrevocable letter of credit as a condition for again being authorized to participate in the program.

### **RIGHTS AND REMEDIES**

Your attention is called to Section 14 of the Food Stamp Act (7 U.S.C. 2023) and to Section 279 of the regulations with respect to your right to a judicial review of this determination. Please note that if a judicial review is desired, the Complaint, naming the United States as the defendant, must be filed in the U.S. District Court for the district in which you reside or are engaged in business, or in any court of record of the State having competent jurisdiction. If any such complaint is filed, it must be filed within thirty (30) days of receipt of this letter.

Under the Freedom of Information Act (FOIA), it may be necessary to release this document and related correspondence and records upon request. If we receive such a request, we will seek to protect, to the extent provided by law, personal information that if released, could constitute and unwarranted invasion of privacy.

This determination shall not preclude the Department of Agriculture or any other agency or department of the United States from taking further action to collect any claim for credit violations determined under the regulations governing the Food Stamp Program or under any other pertinent statutes or regulations.

ORIGINAL SIGNED BY  
RICHARD J. HAVNEN

\_\_\_\_\_  
Richard J. Havnen  
Administrative Review Officer

\_\_\_\_\_  
February 28, 2008

Date



UNITED STATES DEPARTMENT OF AGRICULTURE  
FOOD AND NUTRITION SERVICE

Administrative Review Branch

11000 Truchard Court  
Bakersfield, CA 93312-6723  
Tel. (661) 589-5465

January 29, 2008

Franklyn F. Lugo, Owner  
Ivana Grocery Store  
1665 Topping Avenue  
Bronx, New York 10457-7107

Dear Mr. Lugo:

The Chief of the Administrative Review Branch received your letter of January 16, 2008 in which you requested an administrative review of the initial decision by the New York City, New York Field Office of the Food and Nutrition Service to disqualify your store from participation in the Food Stamp Program. The Branch Chief has granted your request for review and has assigned the case to me. Any further correspondence regarding this review should be addressed to me.

I am writing the Food and Nutrition Service Field Office to withhold further action on its decision to disqualify the store until the review has been completed and I have advised you of my determination. Thus, you may continue to accept food stamp program benefit instruments at the store in accordance with Food Stamp Program regulations until that time.

If there is any additional information you may wish to provide in support of your position in this matter, it must be provided to me with a postmark no later than February 22, 2008.

Sincerely,

**ORIGINAL SIGNED BY  
RICHARD J. HAVNEN**

Richard J. Havnen  
Administrative Review Officer

bcc: Gilda Torres, OIC, Metro I, NY  
Courtney L. Wilkerson, Chief, ARB ✓

**Torres, Gilda**

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**From:** Self, Robin  
**Sent:** Friday, January 25, 2008 11:00 AM  
**To:** Torres, Gilda; Thomas, Denise; Nathaniel, Dina; Gilbert, LaShon  
**Subject:** RE: Request for Review

ARB received the following appeal.

IVANA GROCERY STORE  
BRONX, NY  
Date Mailed: 1-9-08  
Date Recd: 1-10-08  
Date of Request: 1-18-08  
Action: 1 YEAR  
Review Officer: RICHARD HAVNEN  
CASE NUMBER: C0120265

**FRANKLYN F. LUGO**  
**Ivana Grocery Store**  
**1665 Topping Avenue**  
**Bronx, NY 10457**

20  
22 08  
ADMINISTRATIVE REVIEW DIVISION

January 16, 2008

Director, Administrative Review Staff  
USDA, FNS  
3101 Park Center Drive, Rm 608  
Alexandria, Virginia 22302

Re: FSN#: 0100468

To Whom It May Concern:

I, Franklyn F. Lugo, Owner of Ivana Grocery Store, located 1665 Topping Avenue, Bronx, NY 10457 am writing this letter to request an administrative review of the information that has been provided to the New York Office and hopefully dispense with the possibility of a disqualification.

As per your investigative report, you were originally charging my business with trafficking violations due to excessive withdrawals from recipient accounts and excessive key entered transactions. After you considered our reply dated November 13, 2007, the permanent disqualification as a consequence of the trafficking violation was dropped to a one (1) year disqualification.

As stated previously, I was having a very difficult time getting my business off the ground. It took a while but I was able to win back clients and increase EBT usage. I also afforded them the opportunity to take food items on credit and pay when they received their food stamps. They would in turn make the payments owed and then they would make the necessary purchases that they needed to sustain their families. Yes, sometimes this would deplete their benefits, but the client was getting their needs met. Please consider the demographics of the neighborhood where many families do not even have the basic necessities for their children like milk, bread etc. I now know that giving the clients credit is not allowed and I have discontinued this practice. I enclosed several notarized letters from clients to verify this information.

Also with the new buildings being renovated within the neighborhood this created an increase in the amount of clients that visit this business, which amounted to more EBT usage.

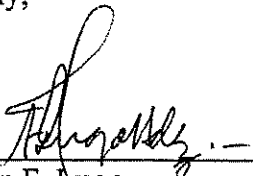
The situation with the keyed in charges is an issue that is happening everywhere. The card will work in one store but will not register in another unless it is keyed in. It has nothing to do with the machine themselves but with the cards, not sure whether it is the magnetic strip that gets messed up but that is what happens and we have to key enter the card. This same complaint is being heard from must of the merchants that are in EBT the program.

EBT transactions amount to approximately 60% of the revenue generated by my business and without this important contract, my business would be put under a financial strain and my dreams of running a successful business will be gone.

I am requesting that you take all the information that I have given you into consideration and not disqualify my business from the program. Give me an opportunity to stay in the program and continue to provide services to this community.

Your cooperation and consideration will be appreciated.

Sincerely,

  
\_\_\_\_\_  
Franklyn F. Lugo

REGION:	Alta	
NOTICE:	MAILED:	7-2-08
	REC'D:	7-2-08
DATE OF REQUEST:	7-15-08	
ACTION:	DISQ.:	1 year
	DA	WA
BASIS:	C01202-65	
CB#		
OL#		
ASSIGNED TO:	RC	

#33



**United States  
Department of  
Agriculture**

Food and  
Nutrition  
Service

New York City Field Office  
201 Varick St  
RM 609  
New York City, NY 10014  
(212) 620-3691

Franklyn F Lugo  
Ivana Grocery Store  
1665 Topping Avenue  
Bronx, NY 10457

JAN - 9 2008

Dear Mr. Lugo:

Consideration has been given to the information and evidence available to us relating to our letter of charges dated 11/6/2007 and to your reply of 11/13/2007. We find that you accepted payment on credit accounts. The acceptance of Food Stamp benefits on credit accounts is in violation of section 278.2(f) of the Food Stamp Program (FSP) regulations (enclosed).

We considered your eligibility for a civil money penalty (CMP) according to the terms of section 278.6(f)(1) of the Food Stamp Program (FSP) regulations (enclosed). We have determined that you are not eligible for the CMP because there are other authorized retail stores in the area selling as large a variety of staple foods at comparable prices.

Therefore, your firm shall be disqualified from the Food Stamp Program for a period of one year. This is in accordance with (section 278.6(e)(4)) of the FSP regulations.

This disqualification will become effective on the 10th calendar day following your receipt of this letter. If the 10th calendar day is a Saturday, Sunday or legal (Federal) holiday, the disqualification will be effective the next day which is not a Saturday, Sunday or legal (Federal) holiday.

This determination will be final unless you submit a written request for review to the Director, Administrative Review Staff, USDA, FNS, 3101 Park Center Drive, Room 608, Alexandria, Virginia 22302. Your request for review must be postmarked by midnight of the 10th calendar day after you receive this letter, in order to be considered timely. If the 10th day of the period for requesting review falls on a Saturday, Sunday or legal (Federal) holiday, a request for review will be timely if it is postmarked the next day which is not a Saturday, Sunday or legal (Federal) holiday. The rules governing your review rights are contained in section 279 of the FSP regulations.

If a timely request for review is made, you may continue to accept and redeem food stamp benefits until the review officer has made a decision on your request.

This determination shall not preclude the Department of Agriculture or any other agency or department of the United States from taking further action to collect any claim determined under the FSP regulations or under any other pertinent statutes or regulations, nor shall this determination preclude prosecution under any applicable penal statutes.

Your authorization card, number 0100468, and all program materials must be returned to this office. Your Electronic Benefit Transfer (EBT) processor will be advised to disable your EBT connection. Your EBT machine should be returned to your EBT vendor. If you accept food stamp benefits after the effective date of disqualification, you will be subject to a severe monetary fine, per section 278.6(m) of the FSP regulations, and possible prosecution under

A.R. 12

applicable penal statutes.

If you are an authorized vendor under the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), you may be disqualified from the WIC Program as a result of your disqualification from the FSP. In accordance with current law governing both the FSP and the WIC Program, such a WIC Program disqualification is not subject to administrative or judicial review under the WIC Program. A Civil Money Penalty from the Food Stamp Program may also result in a WIC Program disqualification, but such a disqualification would be subject to administrative and/or judicial review.

In the event that you sell or transfer ownership of your store after you are disqualified, you will be subject to and liable for a CMP as provided by FSP regulations sections 278.6(f)(2),(3) and (4). The amount of this sale or transfer CMP will be calculated based on FSP regulations 278.6(g).

You may apply for authorization at the end of your disqualification period. You will be required to submit a collateral bond or irrevocable letter of credit in the amount of \$000.00

Si usted tiene dificultad entendiendo esta carta debido a falta de conocimiento del idioma inglés, llame a nuestra oficina al número: (212) 620-3691 inmediatamente. Nosotros le explicaremos o traduciremos el contenido.

Sincerely,



Gilda Torres

Officer-In-Charge

Metro I

New York Federal Nutrition Program

Enclosures

Case Number: C0120265

Ivana Grocery Store  
 Store Number: NONE  
 1665 Topping Ave  
 AKA 322 E 173 St  
 Bronx, New York 10457  
 County: BRONX  
 United States of America

FNS Number: 0100468

Store Status:  Authorized

Status Reason: Initial Authorization  
 Status Effective Date: 03/20/2007

Case Worker: Margarita  
 Cora (New York, NY)  
 Case Office: New York,  
 NY  
 Case Originator: Field  
 Office  
 Case Status: Open  
 Case Owner: Field Office

Corporation Name: NONE  
 Corporation Number: NONE

CATS Number: NONE  
 Case Opening Date:  
 09/18/2007

Basis of Case: EBT: Transaction Analysis/ALERT/Watch List

## Add a Case Event:

Select One

Add

Event Name	Event Date	Date	Status / Determination	Last Updated	Entered By
<u>Determination</u>	Letter Delivery Date	01/10/2008	Less than Permanent DQ	01/10/2008	Margarita Cora (New York, NY)
<u>Retailer Reply</u>	Reply Date	11/13/2007		11/29/2007	Margarita Cora (New York, NY)
<u>Case Summary</u>	Open Date	11/07/2007		11/07/2007	Margarita Cora (New York, NY)
<u>Adverse Action Letter</u>	Delivery Date	11/07/2007		11/07/2007	Margarita Cora (New York, NY)
<u>EBT Visit</u>	Visit Date	10/01/2007		10/10/2007	Margarita Cora (New York, NY)
<u>Case Opening</u>	Case Opening Date	09/18/2007		09/18/2007	Lawrence Kessler (New York, NY)

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[Page ID: C\_113]

# **CLIENTS**



**ATTACHMENT 5**

In a series of Food Stamp EBT transactions, excessively large withdrawals were made from the accounts of the Food Stamp recipients below.

<i>TERMINAL</i>	<i>DATE</i>	<i>TIME</i>	<i>AMOUNT</i>	<i>METHOD</i>
<b>6000008487B01</b>				
<i>June 2007</i>				
34534D	6/12/2007	10:30:31 AM	\$100.79	key
34534D	6/12/2007	3:45:38 PM	\$87.69	key
34534D	6/13/2007	10:37:36 AM	\$100.89	key
34534D	6/13/2007	4:12:15 PM	\$97.32	key
34534D	6/14/2007	3:19:40 PM	\$84.62	key
34534D	6/15/2007	10:31:08 AM	\$71.97	key
<i>Total :</i>	6		\$543.28	
<i>July 2007</i>				
34534D	7/11/2007	11:03:30 AM	\$81.51	key
34534D	7/11/2007	4:57:01 PM	\$95.03	key
<i>Total :</i>	2		\$176.54	
<i>August 2007</i>				
34534D	8/10/2007	10:29:58 AM	\$99.84	key
<i>Total :</i>	1		\$99.84	
<b>Total Transactions:</b>	9		\$819.66	

**6005890801D01***June 2007*

34534D	6/4/2007	1:39:11 PM	\$101.74	swipe
34534D	6/13/2007	3:29:28 PM	\$70.12	swipe

<i>Total :</i>	2		\$171.86	
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*July 2007*

34534D	7/6/2007	11:53:38 AM	\$85.78	swipe
34534D	7/12/2007	10:03:58 AM	\$81.37	swipe

<i>Total :</i>	2		\$167.15	
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*August 2007*

34534D	8/2/2007	8:44:16 AM	\$101.07	key
34534D	8/9/2007	10:51:02 AM	\$90.83	swipe

<i>Total :</i>	2		\$191.90	
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<b>Total Transactions:</b>	6		\$530.91	
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**6002484953B01***June 2007*

34534D	6/13/2007	6:51:32 PM	\$88.13	key
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<i>Total :</i>	1		\$88.13	
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0100468

10/22/2007

Page 1 of 8

ATTACHMENT 5 by household

<i>TERMINAL</i>	<i>DATE</i>	<i>TIME</i>	<i>AMOUNT</i>	<i>METHOD</i>
<i>July 2007</i>				
34534D	7/12/2007	1:42:11 PM	\$104.76	key
34534D	7/12/2007	6:05:06 PM	\$72.36	key
<i>Total :</i>	2		\$177.12	
<i>August 2007</i>				
34534D	8/13/2007	12:09:17 PM	\$85.21	key
34534D	8/15/2007	6:13:36 PM	\$76.99	key
34534D	8/21/2007	2:06:24 PM	\$99.80	key
<i>Total :</i>	3		\$262.00	
<b>Total Transactions:</b>		6	\$527.25	

**6000432060C01***June 2007*

34534D	6/1/2007	8:53:55 AM	\$102.75	key
34534D	6/2/2007	9:16:55 AM	\$100.75	key

<i>Total :</i>	2		\$203.50	
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*July 2007*

34534D	7/2/2007	10:10:58 AM	\$91.75	key
34534D	7/3/2007	10:06:39 AM	\$92.25	key

<i>Total :</i>	2		\$184.00	
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*August 2007*

34534D	8/5/2007	10:09:19 AM	\$91.25	key
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<i>Total :</i>	1		\$91.25	
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<b>Total Transactions:</b>		5	\$478.75	
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**6000312764E01***June 2007*

34534D	6/7/2007	7:40:35 PM	\$109.60	key
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<i>Total :</i>	1		\$109.60	
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*July 2007*

34534D	7/7/2007	12:14:48 PM	\$100.13	key
34534D	7/8/2007	6:35:50 PM	\$80.59	key

<i>Total :</i>	2		\$180.72	
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*August 2007*

34534D	8/7/2007	8:53:07 AM	\$93.85	key
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<i>Total :</i>	1		\$93.85	
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<b>Total Transactions:</b>		4	\$384.17	
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**66006683789J01***June 2007*

34534D	6/14/2007	10:02:09 AM	\$99.87	key
34534D	6/15/2007	11:16:32 AM	\$87.21	key

<i>Total :</i>	2		\$187.08	
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*July 2007*

0100468

10/22/2007

Page 2 of 8

ATTACHMENT 5 by household

TERMINAL	DATE	TIME	AMOUNT	METHOD
34534D	7/13/2007	10:34:18 AM	\$91.03	key
<i>Total :</i>		1		\$91.03
<i>August 2007</i>				
34534D	8/14/2007	10:38:17 AM	\$101.50	key
<i>Total :</i>		1		\$101.50
<b>Total Transactions:</b>		4		\$379.61

**66002590624J01***June 2007*

34534D	6/7/2007	8:32:03 AM	\$84.99	swipe
34534D	6/7/2007	7:43:36 PM	\$99.47	swipe
<i>Total :</i>		2		\$184.46

*July 2007*

34534D	7/8/2007	4:39:51 PM	\$97.89	swipe
<i>Total :</i>		1		\$97.89

*August 2007*

34534D	8/7/2007	10:29:56 AM	\$78.24	swipe
<i>Total :</i>		1		\$78.24

<b>Total Transactions:</b>	4	\$360.59
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**66002527243G01***June 2007*

34534D	6/6/2007	12:35:16 PM	\$100.27	key
<i>Total :</i>		1		\$100.27

*July 2007*

34534D	7/11/2007	7:30:20 PM	\$74.23	key
34534D	7/13/2007	11:44:41 PM	\$77.85	key
<i>Total :</i>		2		\$152.08

*August 2007*

34534D	8/4/2007	12:19:32 PM	\$75.00	key
<i>Total :</i>		1		\$75.00

<b>Total Transactions:</b>	4	\$327.35
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**66005666488B01***June 2007*

34534D	6/14/2007	1:48:09 PM	\$72.23	key
34534D	6/16/2007	3:26:09 PM	\$72.54	key
<i>Total :</i>		2		\$144.77

*July 2007*

34534D	7/13/2007	9:58:42 AM	\$108.53	key
<i>Total :</i>		1		\$108.53

*August 2007*

34534D	8/16/2007	1:32:07 PM	\$72.13	key
<i>Total :</i>		1		\$72.13

0100468

10/22/2007

Page 3 of 8

ATTACHMENT 5 by household

<i>TERMINAL</i>	<i>DATE</i>	<i>TIME</i>	<i>AMOUNT</i>	<i>METHOD</i>
<b>Total Transactions:</b>		4		\$325.43

**36003921297C01***June 2007*

34534D	6/13/2007	4:20:19 PM	\$74.93	key
34534D	6/14/2007	6:01:18 PM	\$76.33	swipe
<b>Total :</b>	2		\$151.26	

*July 2007*

34534D	7/12/2007	9:21:02 PM	\$82.25	swipe
<b>Total :</b>	1		\$82.25	

*August 2007*

34534D	8/10/2007	3:53:52 PM	\$91.05	key
<b>Total :</b>	1		\$91.05	

<b>Total Transactions:</b>		4		\$324.56
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**66004668777I01***June 2007*

34534D	6/11/2007	8:32:49 AM	\$109.09	key
<b>Total :</b>	1		\$109.09	

*July 2007*

34534D	7/11/2007	9:41:34 AM	\$91.75	key
<b>Total :</b>	1		\$91.75	

*August 2007*

34534D	8/10/2007	11:06:18 AM	\$107.55	key
<b>Total :</b>	1		\$107.55	

<b>Total Transactions:</b>		3		\$308.39
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**710026174***August 2007*

34534D	8/4/2007	5:40:26 PM	\$101.03	swipe
34534D	8/6/2007	5:56:46 PM	\$101.72	swipe
34534D	8/11/2007	2:07:09 PM	\$102.00	swipe
<b>Total :</b>	3		\$304.75	

<b>Total Transactions:</b>		3		\$304.75
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**36006276021A01***June 2007*

34534D	6/5/2007	9:17:10 AM	\$101.09	swipe
<b>Total :</b>	1		\$101.09	

*July 2007*

34534D	7/5/2007	9:09:22 AM	\$100.72	key
<b>Total :</b>	1		\$100.72	

*August 2007*

34534D	8/3/2007	2:47:14 PM	\$101.77	swipe
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0100468

10/22/2007

Page 4 of 8

ATTACHMENT 5 by household

TERMINAL	DATE	TIME	AMOUNT	METHOD
<i>Total :</i>		1	\$101.77	
<b>Total Transactions:</b>		3	\$303.58	

**6002807738G01***June 2007*

34534D	6/16/2007	5:20:57 PM	\$101.25	swipe
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<i>Total :</i>	1	\$101.25
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*July 2007*

34534D	7/12/2007	3:50:03 PM	\$102.09	key
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<i>Total :</i>	1	\$102.09
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*August 2007*

34534D	8/14/2007	7:59:48 PM	\$99.89	swipe
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<i>Total :</i>	1	\$99.89
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<b>Total Transactions:</b>	3	\$303.23
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**6008507358D01***June 2007*

34534D	6/13/2007	11:19:56 AM	\$75.74	key
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34534D	6/14/2007	1:04:14 PM	\$77.13	swipe
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<i>Total :</i>	2	\$152.87
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*July 2007*

34534D	7/13/2007	3:15:14 PM	\$72.10	swipe
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34534D	7/17/2007	1:00:35 PM	\$74.25	swipe
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<i>Total :</i>	2	\$146.35
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<b>Total Transactions:</b>	4	\$299.22
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**6000273069F01***June 2007*

34534D	6/6/2007	12:26:32 PM	\$107.85	key
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<i>Total :</i>	1	\$107.85
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*July 2007*

34534D	7/6/2007	11:37:29 AM	\$78.15	key
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<i>Total :</i>	1	\$78.15
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*August 2007*

34534D	8/6/2007	4:58:20 PM	\$101.99	key
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<i>Total :</i>	1	\$101.99
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<b>Total Transactions:</b>	3	\$287.99
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**6000922020D01***June 2007*

34534D	6/4/2007	2:08:35 PM	\$112.78	key
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<i>Total :</i>	1	\$112.78
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*July 2007*

34534D	7/2/2007	9:38:09 AM	\$88.27	key
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<i>Total :</i>	1	\$88.27
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0100468

10/22/2007

Page 5 of 8

ATTACHMENT 5 by household

<i>TERMINAL</i>	<i>DATE</i>	<i>TIME</i>	<i>AMOUNT</i>	<i>METHOD</i>
<i>August 2007</i>				
34534D	8/1/2007	11:25:28 AM	\$86.35	key
<i>Total :</i>		1		\$86.35
<i>Total Transactions:</i>			3	\$287.40

**i66002284700I01***June 2007*

34534D	6/7/2007	8:18:17 PM	\$85.32	key
34534D	6/12/2007	5:40:31 PM	\$99.88	key

<i>Total :</i>		2		\$185.20
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*July 2007*

34534D	7/11/2007	8:44:38 AM	\$101.28	key
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<i>Total :</i>		1		\$101.28
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<i>Total Transactions:</i>			3	\$286.48
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**i6004211821G01***June 2007*

34534D	6/4/2007	9:01:16 AM	\$99.86	key
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<i>Total :</i>		1		\$99.86
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*July 2007*

34534D	7/3/2007	10:08:53 AM	\$88.39	key
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<i>Total :</i>		1		\$88.39
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*August 2007*

34534D	8/2/2007	12:01:07 PM	\$97.89	key
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<i>Total :</i>		1		\$97.89
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<i>Total Transactions:</i>			3	\$286.14
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**i6000750509C01***June 2007*

34534D	6/14/2007	9:43:04 AM	\$101.73	swipe
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<i>Total :</i>		1		\$101.73
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*July 2007*

34534D	7/13/2007	11:15:04 AM	\$79.91	swipe
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<i>Total :</i>		1		\$79.91
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*August 2007*

34534D	8/14/2007	9:45:38 AM	\$102.70	swipe
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<i>Total :</i>		1		\$102.70
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<i>Total Transactions:</i>			3	\$284.34
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**i6006497840G01***July 2007*

34534D	7/2/2007	3:05:39 PM	\$101.73	key
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34534D	7/6/2007	12:06:08 PM	\$92.31	key
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<i>Total :</i>		2		\$194.04
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0100468

10/22/2007

Page 6 of 8

ATTACHMENT 5 by household

TERMINAL	DATE	TIME	AMOUNT	METHOD
<i>August 2007</i>				
34534D	8/2/2007	4:19:14 PM	\$81.25	key
<i>Total :</i>		1		\$81.25
<b>Total Transactions:</b>		3		\$275.29

**36001310448E01***June 2007*

34534D	6/23/2007	11:26:45 AM	\$87.68	key
<i>Total :</i>		1		\$87.68

*July 2007*

34534D	7/3/2007	11:25:27 AM	\$98.25	key
<i>Total :</i>		1		\$98.25

*August 2007*

34534D	8/3/2007	12:03:46 PM	\$88.50	key
<i>Total :</i>		1		\$88.50

<b>Total Transactions:</b>		3		\$274.43
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**36004662306C01***June 2007*

34534D	6/9/2007	11:38:21 AM	\$104.85	swipe
<i>Total :</i>		1		\$104.85

*July 2007*

34534D	7/10/2007	10:47:52 AM	\$73.55	swipe
<i>Total :</i>		1		\$73.55

*August 2007*

34534D	8/9/2007	11:09:41 AM	\$89.09	swipe
<i>Total :</i>		1		\$89.09

<b>Total Transactions:</b>		3		\$267.49
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**36005325470C01***June 2007*

34534D	6/2/2007	5:20:29 PM	\$106.72	swipe
34534D	6/3/2007	11:41:31 AM	\$80.38	key
34534D	6/5/2007	4:06:24 PM	\$71.25	key
<i>Total :</i>		3		\$258.35

<b>Total Transactions:</b>		3		\$258.35
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**36004089880B01***June 2007*

34534D	6/1/2007	1:30:30 PM	\$71.25	key
<i>Total :</i>		1		\$71.25

*July 2007*

34534D	7/2/2007	3:56:34 PM	\$85.43	key
<i>Total :</i>		1		\$85.43

0100468

10/22/2007

Page 7 of 8

ATTACHMENT 5 by household

<i>TERMINAL</i>	<i>DATE</i>	<i>TIME</i>	<i>AMOUNT</i>	<i>METHOD</i>
<i>August 2007</i>				
34534D	8/1/2007	8:36:12 PM	\$79.23	key
<i>Total :</i>		1		\$79.23
<i>Total Transactions:</i>		3		\$235.91
<b>6004211851D01</b>				
<i>June 2007</i>				
34534D	6/14/2007	5:01:12 PM	\$81.00	key
<i>Total :</i>		1		\$81.00
<i>July 2007</i>				
34534D	7/17/2007	5:59:22 PM	\$72.40	key
<i>Total :</i>		1		\$72.40
<i>August 2007</i>				
34534D	8/14/2007	3:50:15 PM	\$79.85	key
<i>Total :</i>		1		\$79.85
<i>Total Transactions:</i>		3		\$233.25
<i>Total Transactions:</i>		99		\$8,954.52



# **DETERMINATION LETTER**

**Cora, Margarita**

**From:** TrackingUpdates@fedex.com  
**Sent:** Thursday, January 10, 2008 10:33 AM  
**To:** Cora, Margarita  
**Subject:** FedEx Shipment 790913173630 Delivered

This tracking update has been requested by:

Company Name: USDA FNS  
Name: Gilda Torres  
E-mail: margarita.cora@fns.usda.gov

Our records indicate that the following shipment has been delivered:

Reference: 43-1358-4-020  
Ship (P/U) date: Jan 9, 2008  
Delivery date: Jan 10, 2008 10:27 AM  
Sign for by: X.GONZALEZ  
Delivered to: Receptionist/Front Desk  
Service type: FedEx Priority Overnight  
Packaging type: FedEx Envelope  
Number of pieces: 1  
Weight: 0.50 lb.  
Special handling/Services: Adult Signature Required  
Deliver Weekday

Tracking number: 790913173630

Shipper Information	Recipient Information
Gilda Torres	Franklyn F. Lugo
USDA FNS	Ivana Grocery Store
201 VARICK ST RM 609	1665 TOPPING AVE
NEW YORK	BRONX
NY	NY
US	US
10014	104577107

Please do not respond to this message. This email was sent from an unattended mailbox. This report was generated at approximately 9:32 AM CST on 01/10/2008.

To learn more about FedEx Express, please visit our website at [fedex.com](http://fedex.com).

All weights are estimated.

To track the latest status of your shipment, click on the tracking number above, or visit us at [fedex.com](http://fedex.com).

This tracking update has been sent to you by FedEx on the behalf of the Requestor noted above. FedEx does not validate the authenticity of the requestor and does not validate, guarantee or warrant the authenticity of the request, the requestor's message, or the accuracy of this tracking update. For tracking results and fedex.com's terms of use, go to [fedex.com](http://fedex.com).

Thank you for your business.

A.R. 25

1/10/2008

From: Origin ID: UTOA (212)620-3691  
Gilda Torres  
USDA FNS  
201 VARICK ST RM 609

NEW YORK, NY 10014



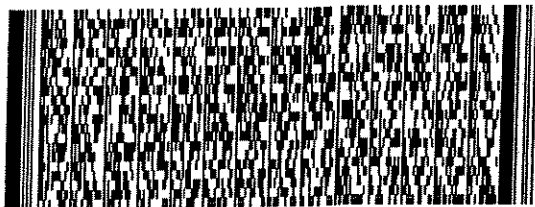
CL509087/2/023

SHIP TO: (718)466-4935

BILL SENDER

Franklyn F. Lugo  
Ivana Grocery Store  
1665 TOPPING AVE

BRONX, NY 104577107



Ship Date: 09JAN08  
ActWgt: 1 LB  
System#: 1664936/INET7091  
Account#: S \*\*\*\*\*

Delivery Address Bar Code



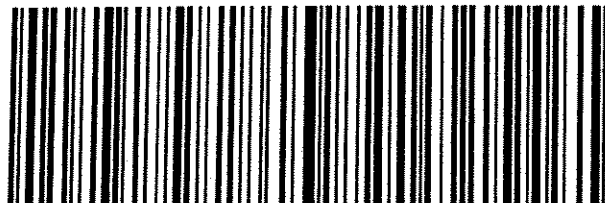
Ref # 43-1358-4-020  
Invoice #  
PO #  
Dept #

TRK# 7909 1317 3630  
0201

THU - 10JAN A2  
PRIORITY OVERNIGHT  
ASR

ZM-HPNA

JFK  
NY-US  
10457



Shipping Label: Your shipment is complete

1. Use the 'Print' feature from your browser to send this page to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.



**United States  
Department of  
Agriculture**

Food and  
Nutrition  
Service

New York City Field Office  
201 Varick St  
RM 609  
New York City, NY 10014  
(212) 620-3691

Franklyn F Lugo  
Ivana Grocery Store  
1665 Topping Avenue  
Bronx, NY 10457

JAN - 9 2008

Dear Mr. Lugo:

Consideration has been given to the information and evidence available to us relating to our letter of charges dated 11/6/2007 and to your reply of 11/13/2007. We find that you accepted payment on credit accounts. The acceptance of Food Stamp benefits on credit accounts is in violation of section 278.2(f) of the Food Stamp Program (FSP) regulations (enclosed).

We considered your eligibility for a civil money penalty (CMP) according to the terms of section 278.6(f)(1) of the Food Stamp Program (FSP) regulations (enclosed). We have determined that you are not eligible for the CMP because there are other authorized retail stores in the area selling as large a variety of staple foods at comparable prices.

Therefore, your firm shall be disqualified from the Food Stamp Program for a period of one year. This is in accordance with (section 278.6(e)(4)) of the FSP regulations.

This disqualification will become effective on the 10th calendar day following your receipt of this letter. If the 10th calendar day is a Saturday, Sunday or legal (Federal) holiday, the disqualification will be effective the next day which is not a Saturday, Sunday or legal (Federal) holiday.

This determination will be final unless you submit a written request for review to the Director, Administrative Review Staff, USDA, FNS, 3101 Park Center Drive, Room 608, Alexandria, Virginia 22302. Your request for review must be postmarked by midnight of the 10th calendar day after you receive this letter, in order to be considered timely. If the 10th day of the period for requesting review falls on a Saturday, Sunday or legal (Federal) holiday, a request for review will be timely if it is postmarked the next day which is not a Saturday, Sunday or legal (Federal) holiday. The rules governing your review rights are contained in section 279 of the FSP regulations.

If a timely request for review is made, you may continue to accept and redeem food stamp benefits until the review officer has made a decision on your request.

This determination shall not preclude the Department of Agriculture or any other agency or department of the United States from taking further action to collect any claim determined under the FSP regulations or under any other pertinent statutes or regulations, nor shall this determination preclude prosecution under any applicable penal statutes.

Your authorization card, number 0100468, and all program materials must be returned to this office. Your Electronic Benefit Transfer (EBT) processor will be advised to disable your EBT connection. Your EBT machine should be returned to your EBT vendor. If you accept food stamp benefits after the effective date of disqualification, you will be subject to a severe monetary fine, per section 278.6(m) of the FSP regulations, and possible prosecution under

applicable penal statutes.

If you are an authorized vendor under the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), you may be disqualified from the WIC Program as a result of your disqualification from the FSP. In accordance with current law governing both the FSP and the WIC Program, such a WIC Program disqualification is not subject to administrative or judicial review under the WIC Program. A Civil Money Penalty from the Food Stamp Program may also result in a WIC Program disqualification, but such a disqualification would be subject to administrative and/or judicial review.

In the event that you sell or transfer ownership of your store after you are disqualified, you will be subject to and liable for a CMP as provided by FSP regulations sections 278.6(f)(2),(3) and (4). The amount of this sale or transfer CMP will be calculated based on FSP regulations 278.6(g).

You may apply for authorization at the end of your disqualification period. You will be required to submit a collateral bond or irrevocable letter of credit in the amount of \$000.00

Si usted tiene dificultad entendiendo esta carta debido a falta de conocimiento del idioma inglés, llame a nuestra oficina al número: (212) 620-3691 inmediatamente. Nosotros le explicaremos o traduciremos el contenido.

Sincerely,



Gilda Torres

Officer-In-Charge

Metro I

New York Federal Nutrition Program

Enclosures

## PAPER CASE HISTORY



On Nov 7, 2007 Benjamin  
Guzman identified himself as  
Ivona Grocery Stores Manager,  
called for Franklin Lugo due to English  
problems. I told Mr. Guzman that Mr. Lugo  
can contact me in reference to the charge  
letter dated 11/6/07.

I advised Mr. Guzman that Mr. Lugo  
must reply by 11/19/07. I mentioned  
that he has the option of replying in  
writing or in person.

M. Lora 11/5/07

**REPLY  
TO  
CHARGE  
LETTER**



**FRANKLYN F. LUGO**  
**Ivana Grocery Store**  
**1665 Topping Avenue**  
**Bronx, NY 10457**

November 13, 2007

United State Department of Agriculture  
Food and Nutrition Service  
New York City Field Office  
201 Varick Street, RM 609  
New York, NY 10014

Re: FSN#: 0100468

Dear Ms. Gilda Torres:

I Franklyn F. Lugo, Owner of Ivana Grocery Store, located 1665 Topping Avenue, Bronx, NY 10457 am writing this letter to clarify the information that has been received by your department and hopefully dispense with the possibility of a permanent disqualification.

As per your investigative report, you are charging my business with trafficking violations due to excessive withdrawals from recipient accounts and excessive key entered transactions.

First, when I became the owner of this business I notice that there were several people in the neighborhood who would not make purchases from this location and after some time I found out that there has been a problem with the previous owner and they refused to buy here. It took a while but eventually I was able to win back these clients and in doing so my EBT usage was increased. I also afforded them the opportunity to take food items on credit and pay when they received their food stamps. They would in turn make the payments owed and then they would make the necessary purchases that they needed to sustain their families. Yes, sometimes this would deplete their benefits, but the client was getting their needs met.

Second, there have been several new buildings that have renovated within the neighborhood and because of this there has also been an increase in the amount of clients that visit this business, which amounts to a larger amount of EBT usage.

Third, in respect to the excessive amount of key entered transactions, please be aware that for some clients, let me rephrase that, for a lot of the clients that visit my business, we have difficulty with swiping their cards. The machine does not register the swipe so we in turn have to manually enter the card numbers. It has nothing to do with the machine themselves but with the cards, not sure whether it is the magnetic strip that gets messed up but that is what happens and we have to key enter the card. This same complaint is being heard from must of the merchants in the area.

RCVD NOV 16 2007

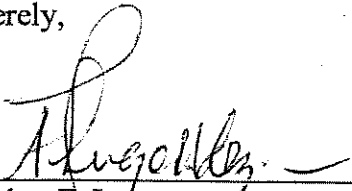


Please be aware that the country where I grew up it is a general practice to give and receive credit when needed, so it was a natural thing for me to do the same here, I now know that giving the clients credit is not allowed and I will discontinue this practice immediately. I am enclosing several notarized letters from clients to verify this information.

I am requesting that you take all the information that I have given you into consideration and not disqualify my business from the program. Give me an opportunity to stay in the program and continue to provide services to this community.

Your cooperation and consideration will be appreciated.

Sincerely,

  
\_\_\_\_\_  
Franklyn F. Lugo

# **CLIENT DATA**

**Households that were matched to the  
Administrative Terminal**

JAMES CARTER  
Notary Public, State of New York  
No. 01CA4987969  
Qualified in Bronx County  
Commission Expires Jan. 14, 2010

IDENTIFICATION CARD NUMBER  
ZE41059D (500488 8123 2410 95 07)  
SEX F  
LAST NAME DELACRUZ  
FIRST NAME MIRIAM

ADDRESS NUMBER  
8123 2410 595 07

James Carter  
11/12/07

To whom it may concern:

I Miriam de la Cruz would like to inform you that Franklyn Lugo of Ivana Grocery Store gives me store credit and at moments when I don't have to purchase. They do not sell me cigarettes or Beer (Alcoholic Bev). I pay the store when I receive my Food Stamps.

Thank You.  
Miriam de la Cruz.

Untitled

Card #: 6004868123241059507

Svc Site: 66018

Card Sts: 61

Primary/Alternate Indicator: 01  
 First Name Mi Last Name  
 MIRIAM DELACRUZ

Address: 1665 MONROE AVE APT. 4F BRONX, NY. 10457  
 SocSer# Tele#

Date of Birth

EDA: 336009749358 Sts: 01,1,0 Type: 01 EDA: 436009749368 Sts: 01,1,0 Type: 02  
 Last Transaction Information Last Transaction Information  
 Debit: 24.64 11/17/07 14:59:53 Debit: 23.00 11/15/07 04:10:34  
 Credit: 476.00 11/10/07 00:06:02 Credit: 25.00 11/14/07 00:06:13  
 \* Active \* Active  
 Available Balance: 31.12 Available Balance: .00  
 Sel: x Sel:

Card #: 6004868123241059507  
 EDA #: 336009749358

Account Sts: 01  
 Card Sts: 61

Start Date: 060107

Available Balance 31.12

Transaction Information									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	06/09/07	20:17	0,0	.00	.00	6004868123241059812	207 GROCER	YNNNS	
	06/11/07	:06	2,4	454.00	454.00	6004868123241059812	BENEFIT UPDAT	YNNNS	
	06/11/07	7:35	1,0	2.00	2.00	6004868123241059812	BARBARA DE	YNNNS	
	06/11/07	9:34	1,0	2.50	2.50	6004868123241059812	R.M.L. ATM	YNNNS	
	06/11/07	20:37	1,0	279.43	279.43	6004868123241059812	FINE FARE	YNNNS	
	06/12/07	14:45	1,0	1.00	1.00	6004868123241059812	IVANA GROC	YNNK	
	06/12/07	18:22	1,0	28.95	28.95	6004868123241059812	ANGELOS GR	YNNNS	
	06/12/07	18:23	1,0	46.04	46.04	6004868123241059812	ANGELOS GR	YNNNS	
	06/13/07	7:38	1,0	1.75	1.75	6004868123241059812	BARBARA DE	YNNNS	
	06/13/07	7:44	1,0	1.50	1.50	6004868123241059812	1665 GRAND	YNNNS	

Card #: 6004868123241059507  
 EDA #: 336009749358

Account Sts: 01  
 Card Sts: 61

Start Date: 060107

Available Balance 31.12

Transaction Information									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	06/13/07	8:19	1,0	1.00	1.00	6004868123241059812	325 CYPRES	YNNNS	
	06/13/07	15:54	1,0	21.25	21.25	6004868123241059812	AANDN FOOD	YNNK	
	06/13/07	19:17	1,0	16.05	16.05	6004868123241059812	J D 248 FO	YNNNS	
	06/14/07	7:37	1,0	4.00	4.00	6004868123241059812	BARBARA DE	YNNNS	
	06/14/07	8:49	1,0	19.26	19.26	6004868123241059812	DEVO FOOD	YNNNS	
	06/15/07	15:52	1,0	5.25	5.25	6004868123241059812	672 E 138T	YNNNS	
	06/15/07	17:29	1,0	4.81	4.81	6004868123241059812	LA MERCED	YNNNS	
	06/15/07	17:34	1,0	1.50	1.50	6004868123241059812	GABBY GROC	YNNNS	
	06/15/07	18:04	1,0	.60	.60	6004868123241059812	GABBY GROC	YNNNS	
	06/15/07	20:45	1,0	16.69	16.69	6004868123241059812	IVANA GROC	YNNNS	

Card #: 6004868123241059507  
 EDA #: 336009749358

Account Sts: 01  
 Card Sts: 61

Start Date: 060107

Available Balance 31.12

Transaction Information

Page 1

sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	07/10/07	22:48	1,0 *	2.80	.00	6004868123241059812	IVANA GROC	N51K
	07/11/07	:06	2,4	454.00	454.00	6004868123241059812	BENEFIT UPDAT	YNNK
	07/11/07	1:41	1,0	6.50	6.50	6004868123241059812	RIVAS GROC	YNNK
	07/11/07	11:32	1,0	10.51	10.51	6004868123241059812	J D 248 FO	YNNK
	07/11/07	12:58	1,0	18.13	18.13	6004868123241059812	J D 248 FO	YNNK
	07/17/07	17:05	1,0	312.65	312.65	6004868123241059812	FOOD BAZAA	YNNK
	07/17/07	22:33	1,0	1.10	1.10	6004868123241059812	IVANA GROC	YNNK
	07/17/07	23:20	1,0	1.75	1.75	6004868123241059812	IVANA GROC	YNNK
	07/18/07	13:06	1,0	66.49	66.49	6004868123241059812	KELVIN GRO	YNNK
	07/19/07	22:12	1,0	4.29	4.29	6004868123241059812	IVANA GROC	YNNK

Card #: 6004868123241059507  
EDA #: 336009749358

Start Date: 060107

Account Sts: 01  
Card Sts: 61

Available Balance 31.12

sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	07/19/07	23:15	1,0	6.34	6.34	6004868123241059812	IVANA GROC	YNNK
	07/20/07	10:21	1,0	15.70	15.70	6004868123241059812	IVANA GROC	YNNK
	07/20/07	19:44	1,0 *	11.35	11.35	6004868123241059812	J D 248 FO	N51K
	07/20/07	19:45	1,0	11.02	11.02	6004868123241059812	J D 248 FO	YNNK
	08/10/07	:06	2,4	450.00	450.00	6004868123241059812	BENEFIT UPDAT	YNNK
	08/10/07	12:26	1,0	29.08	29.08	6004868123241059812	J D 248 FO	YNNK
	08/10/07	15:12	1,0	23.69	23.69	6004868123241059812	IVANA GROC	YNNK
	08/10/07	18:10	1,0	21.89	21.89	6004868123241059812	IVANA GROC	YNNK
	08/10/07	19:08	1,0	3.89	3.89	6004868123241059812	IVANA GROC	YNNK
	08/10/07	19:10	1,0	3.89	3.89	6004868123241059812	IVANA GROC	YNNK

11/9/07

To Whom it may concern:

I'm writing this letter to let you  
know that Mr. Franklyn says at  
Jenna Gracey store gives me  
credit everything in the store.  
for bread & milk. But never give  
credit for beer & cigarettes.

Donna Hargrett  
1501 Clinton Ave  
Br. N.Y. 10456  
600 486-8124-8241-523-15

Untitled

Card #: 6004868125284254218

Svc Site: 66037

Card Sts: 01

Primary/Alternate Indicator: 01  
 First Name Mi Last Name  
 DONNA HARGRETT

Address: 781 E 135 ST BRONX, NY. 10454  
 SocSec# Tele#

Date of Birth

EDA: 536028569070 Sts: 01,1,0 Type: 01

Last Transaction Information

Debit: 47.50 11/08/07 16:28:34

Credit: 162.00 11/08/07 00:06:02

\* Active

Available Balance: .16

Sel: x

EDA: 636028569084 Sts: 01,1,E Type: 02

Last Transaction Information

Debit: .75 05/04/07 10:27:37

Credit: 6.74 05/02/07 00:06:19

\* Active

Available Balance: .00

Sel:

Card #: 6004868125284254218

EDA #: 536028569070

Account Sts: 01

Card Sts: 01

Start Date: 060107

Available Balance .16

----- Transaction Information -----									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	06/04/07	:06	2,4	155.00	155.00	6004868125284254218	BENEFIT UPDAT	YNNS	
	06/04/07	13:34	1,0	99.98	99.98	6004868125284254218	IVANA GROC	YNNS	
	06/04/07	21:45	1,0	52.25	52.25	6004868125284254218	GENAO GROC	YNNS	
	06/05/07	13:09	1,0	1.49	1.49	6004868125284254218	GENAO GROC	YNNS	
	06/05/07	22:03	1,0	1.25	1.25	6004868125284254218	EL KIOSCO	YNNS	
	07/09/07	:06	2,4	155.00	155.00	6004868125284254218	BENEFIT UPDAT	YNNS	
	07/09/07	9:15	1,0	50.24	50.24	6004868125284254218	GENAO GROC	YNNS	
	07/09/07	9:21	1,0	89.52	89.52	6004868125284254218	IVANA GROC	YNNS	
	07/10/07	9:50	1,0	7.50	7.50	6004868125284254218	CROTONA MI	YNNS	
	07/10/07	11:33	1,0	1.50	1.50	6004868125284254218	CROTONA MI	YNNS	

Card #: 6004868125284254218

EDA #: 536028569070

Account Sts: 01

Card Sts: 01

Start Date: 060107

Available Balance .16

----- Transaction Information -----									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	07/10/07	17:33	1,0	4.74	4.74	6004868125284254218	FINE FARE	YNNS	
	07/11/07	9:08	1,0	1.49	1.49	6004868125284254218	EL KIOSCO	YNNS	
	08/08/07	:06	2,4	155.00	155.00	6004868125284254218	BENEFIT UPDAT	YNNS	
	08/08/07	10:12	1,0	68.43	68.43	6004868125284254218	IVANA GROC	YNNK	
	08/08/07	12:47	1,0	29.65	29.65	6004868125284254218	IVANA GROC	YNNS	
	08/08/07	20:44	1,0	5.25	5.25	6004868125284254218	EL KIOSCO	YNNS	
	08/09/07	10:07	1,0	50.50	50.50	6004868125284254218	IVANA GROC	YNNS	
	08/13/07	11:10	1,0	1.25	1.25	6004868125284254218	CROTONA MI	YNNS	
	09/08/07	:06	2,4	155.00	155.00	6004868125284254218	BENEFIT UPDAT	YNNS	
	09/08/07	10:55	1,0	79.50	79.50	6004868125284254218	IVANA GROC	YNNS	

Page 1



To whom it may Concern

I Gloria Echegaray  
Recieve Credit from the  
Store and pay afterword.

Ivana Grocery Store  
1665 Topping ave  
Bronx NY 10457-

I only purchase Item that  
that are edidable  
they do not allow credit  
for Beer or Ciggarettes

Thank you  
Gloria Echegaray

RCLCSS

New York EBT Production System  
Client Search11/20/07  
09:50:19

Search Type: 05 Program Type: 01 Value: \_\_\_\_\_

SL	L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
—	ECHEGARAY	ANGEL	104-64 48TH	P1	VWB0793E	6004868839180793703
—	ECHEGARAY	BENJAMIN	139 AVENU	P1	SJ64375B	6004868735164375501
—	ECHEGARAY	DANIEL	232 EAST	P1	UB26516W	6004868822226516007
—	ECHEGARAY	DORIS	167 GLEN COVE A	P1	DU66499J	6004868318266499501
—	ECHEGARAY	ELVIRA	1150 GRUNDY AVE	P1	AQ37053G	6004868211137053203
—	NELA	EMILIA	PO BOX 16130	P1	CH94434M	6004862001907411400
—	ECHEGARAY	GARDEMIA	3201 GRAND	P1	XF03536P	6004868923303536213
—	ECHEGARAY	GLORIA	2229 CREST	P1	ZC62251F	6004868122362251703
—	ECHEGARAY	HUGO	2317 ORCHERD DR	P1	WG56385E	6004868914156385402
—	ECHEGARAY	JAJAIRA	385 PALM	P1	YZ27360V	6004868931227360115
—	ECHEGARAY	JOSE	28-03 38TH	P1	TD47988Q	6004868813147988201
—	ECHEGARAY	JUSTO	28 EASTOVER RD	P1	AQ37054E	6004868211137054003
—	ECHEGARAY	LUIS	103-10 QUEEN	P1	TT92604T	6004868818192604801
—	ECHEGARAY	MARIA	30-34 32 ST	P1	UN36927Z	6004868826236927708

Ready for input

F7-ExpCD F8-Rd F2-ExpCS F6-Nx SF4-SEL SF6-Cd Info

Untitled

Card #: 6004868122362251703

Svc Site: 66043

Card Sts: 01

Primary/Alternate Indicator: 01

First Name Mi Last Name  
GLORIA ECHEGARAY

Address: 2229 CRESTON AVENUE APT. 11 BRONX, NY. 10453

SocSec# [REDACTED] Tele#  
347-329-9110Date of Birth  
[REDACTED]

EDA: 936001525014 Sts: 01,1,0 Type: 01

Last Transaction Information

Debit: 2.70 11/08/07 13:26:09

Credit: 162.00 11/02/07 00:06:02

\* Active

Available Balance: .34

Sel: x

EDA: 036001525020 Sts: 01,1,0 Type: 02

Last Transaction Information

Debit: 48.00 11/14/06 12:27:51

Credit: 50.00 11/14/07 00:06:13

\* Active

Available Balance: 50.00

Sel:

Card #: 6004868122362251703

Account Sts: 01

EDA #: 936001525014

Card Sts: 01

Start Date: 060107

Available Balance .34

Transaction Information									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	06/10/07	17:26	1,0	4.49	4.49	6004868122362251703	FAMA REALT	YNNK	
	06/11/07	16:42	1,0	1.30	1.30	6004868122362251703	2096 CONCO	YNNK	
	06/13/07	18:12	1,0	2.29	2.29	6004868122362251703	2096 CONCO	YNNK	
	07/02/07	17:28	1,0 *	13.75	.00	6004868122362251703	2096 CONCO	N51K	
	07/03/07	:06	2,4	155.00	155.00	6004868122362251703	BENEFIT UPDAT	YNNK	
	07/03/07	13:40	1,0	33.49	33.49	6004868122362251703	IVANA GROC	YNNK	
	07/03/07	17:02	1,0	15.26	15.26	6004868122362251703	FAMA REALT	YNNK	
	07/03/07	17:14	1,0	1.35	1.35	6004868122362251703	JOSELYN GR	YNNK	
	07/05/07	13:57	1,0	5.48	5.48	6004868122362251703	1029 FOOD	YNNK	
	07/05/07	17:36	1,0	75.56	75.56	6004868122362251703	2096 CONCO	YNNK	

Card #: 6004868122362251703

Account Sts: 01

EDA #: 936001525014

Card Sts: 01

Start Date: 060107

Available Balance .34

Transaction Information									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	07/06/07	18:04	1,0	12.41	12.41	6004868122362251703	2096 CONCO	YNNK	
	07/07/07	15:07	1,0	2.35	2.35	6004868122362251703	LOS HERMAN	YNNK	
	07/07/07	19:44	1,0	3.29	3.29	6004868122362251703	1029 FOOD	YNNK	
	07/09/07	16:28	1,0 *	8.11	.00	6004868122362251703	2096 CONCO	N51K	
	07/09/07	16:29	1,0	6.26	6.26	6004868122362251703	2096 CONCO	YNNK	
	08/02/07	:06	2,4	155.00	155.00	6004868122362251703	BENEFIT UPDAT	YNNK	
	08/02/07	12:59	1,0	29.13	29.13	6004868122362251703	IVANA GROC	YNNK	
	08/02/07	15:22	1,0	25.81	25.81	6004868122362251703	2096 CONCO	YNNK	
	08/02/07	18:11	1,0	12.36	12.36	6004868122362251703	FAMA REALT	YNNK	
	08/03/07	15:12	1,0	3.29	3.29	6004868122362251703	FAMA REALT	YNNK	

11/10/01

TO WHOM IT MAY CONCERN,

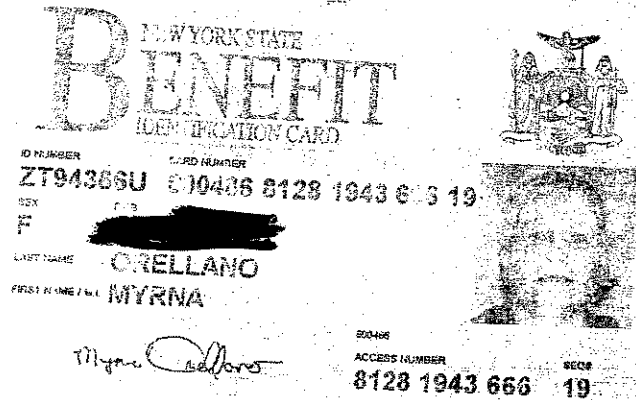
I am writing this letter to let you know that Mr Frankly LUGO at IVANA Grocery store - gives me credit every time in the month. He gives me milk, bread, only food I get from him (the grocery store) I need food for my kids, and he always helps me out! I always pay him back when I get my money or footstamps

Myne Oeller

my I.D. # 6004868128 1943

P.S. THANK YOU  
very much!

666 19.



Untitled

Card #: 6004868128194366619

Svc Site: 665C8

Card Sts: 01

Primary/Alternate Indicator: 01  
 First Name Mi Last Name  
 MYRNA ORELLANO

Address: 1767 WEEKS AVE. APT. 1E BRONX, NY. 10457

SocSec# Tele#

718-294-0573

Date of Birth

EDA: 536007178372 Sts: 01,1,0 Type: 01

Last Transaction Information

Debit: 68.12 11/10/07 14:26:50

Credit: 162.00 11/07/07 00:06:00

\* Active

Available Balance: .67

Sel: x

EDA: 636007178388 Sts: 01,1,E Type: 02

Last Transaction Information

Debit: 15.32 11/17/01 08:13:14

Credit: 36.32 11/16/01 00:06:35

\* Active

Available Balance: .00

Sel:

Card #: 6004868128194366619

Account Sts: 01

EDA #: 536007178372

Card Sts: 01

Start Date: 060107

Available Balance

.67

## Transaction Information

Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	06/07/07	:06	2,4	155.00	155.00	6004868128194366619	BENEFIT UPDAT	YNNK
	06/07/07	15:49	1,0	97.85	97.85	6004868128194366619	IVANA GROC	YNNK
	06/09/07	13:59	1,0	52.28	52.28	6004868128194366619	IVANA GROC	YNNK
	06/09/07	19:03	1,0 *	5.99	.00	6004868128194366619	J D 248 FO	N51K
	06/09/07	19:04	1,0	5.75	5.75	6004868128194366619	J D 248 FO	YNNK
	07/07/07	:06	2,4	155.00	155.00	6004868128194366619	BENEFIT UPDAT	YNNK
	07/07/07	12:26	1,0	57.42	57.42	6004868128194366619	IVANA GROC	YNNK
	07/07/07	13:23	1,0	4.00	4.00	6004868128194366619	GLOBAL FOO	YNNK
	07/08/07	14:41	1,0	1.75	1.75	6004868128194366619	BARBARA DE	YNNK
	07/08/07	15:20	1,0	35.46	35.46	6004868128194366619	DEVO FOOD	YNNK

Card #: 6004868128194366619

Account Sts: 01

EDA #: 536007178372

Card Sts: 01

Start Date: 060107

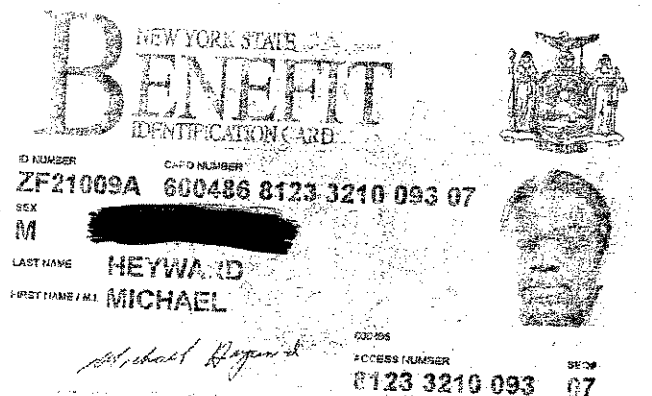
Available Balance

.67

## Transaction Information

Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	07/08/07	18:35	1,0	7.00	7.00	6004868128194366619	PAURIANY #	YNNK
	07/08/07	18:48	1,0	6.75	6.75	6004868128194366619	DUPRESS DE	YNNK
	07/09/07	15:28	1,0 *	50.25	.00	6004868128194366619	IVANA GROC	N51K
	07/09/07	15:34	1,0	42.03	42.03	6004868128194366619	IVANA GROC	YNNK
	08/07/07	:06	2,4	155.00	155.00	6004868128194366619	BENEFIT UPDAT	YNNK
	08/07/07	12:32	1,0	101.25	101.25	6004868128194366619	IVANA GROC	YNNK
	08/09/07	15:27	1,0	51.24	51.24	6004868128194366619	IVANA GROC	YNNK
	08/20/07	14:02	1,0	1.50	1.50	6004868128194366619	PAURIANY #	YNNK
	09/07/07	:06	2,4	155.00	155.00	6004868128194366619	BENEFIT UPDAT	YNNK
	09/07/07	12:58	1,0	99.60	99.60	6004868128194366619	IVANA GROC	YNNK

*James Carter*  
11/12/07  
**JAMES CARTER**  
Notary Public, State of New York  
No. 01CA4987969  
Qualified in Bronx County  
Commission Expires Jan. 14, 20\_\_10



To Whom it MAY concern:

I Michael Heyward Received Credit From  
LUANA Grocery store at 1665 Topping Ave. for milk cereal  
juice, meat products, and Excedra, I pay them back when I  
Received my food stamps of the month. He Really Help  
me and my Family A lot.

*Thank you very much*  
*Michael Heyward*



Untitled

Card #: 6004868123321009307

Svc Site: 66038

Card Sts: 01

Primary/Alternate Indicator: 01

First Name MI Last Name  
MICHAEL HEYWARD

Address: 1747 CLAY AVE APT. 5F BRONX, NY. 10457

SocSec# Tele#  
[REDACTED] 718-299-0824Date of Birth  
[REDACTED]

EDA: 936012208315 Sts: 01,1,0 Type: 01	EDA: 036012208328 Sts: 01,1,0 Type: 02
Last Transaction Information	Last Transaction Information
Debit: .90 11/08/07 14:31:09	Debit: 3.45 11/19/07 16:07:57
Credit: 162.00 11/03/07 00:06:02	Credit: 61.65 11/19/07 00:06:12
* Active	* Active
Available Balance: .06	Available Balance: .40
Sel: x	Sel:

Card #: 6004868123321009307  
EDA #: 936012208315Account Sts: 01  
Card Sts: 01

Start Date: 060107

Available Balance .06

Transaction Information									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	06/06/07	:06	2,4	155.00	155.00	6004868123321009307	BENEFIT UPDAT	YNNS	
	06/06/07	9:10	1,0	7.50	7.50	6004868123321009307	IVANA GROC	YNNK	
	06/06/07	10:30	1,0	37.23	37.23	6004868123321009307	WESTERN BE	YNNS	
	06/06/07	10:53	1,0	30.98	30.98	6004868123321009307	TREMONT ME	YNNS	
	06/06/07	11:24	1,0	50.23	50.23	6004868123321009307	IVANA GROC	YNNS	
	06/06/07	11:25	1,0 *	50.25	.00	6004868123321009307	IVANA GROC	N51S	
	06/06/07	11:51	1,0	28.77	28.77	6004868123321009307	J D 248 FO	YNNS	
	06/11/07	15:01	2,1	50.23	50.23	6004868123321009307	ELEC ADJ CR	YNNS	
	06/22/07	11:58	1,0	49.93	49.93	6004868123321009307	IVANA GROC	YNNK	
	07/06/07	:06	2,4	155.00	155.00	6004868123321009307	BENEFIT UPDAT	YNNS	

Card #: 6004868123321009307  
EDA #: 936012208315Account Sts: 01  
Card Sts: 01

Start Date: 060107

Available Balance .06

Transaction Information									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	07/06/07	9:27	1,0	41.67	41.67	6004868123321009307	TREMONT ME	YNNS	
	07/06/07	9:35	1,0	5.37	5.37	6004868123321009307	J AND J ME	YNNS	
	07/06/07	10:03	1,0	60.52	60.52	6004868123321009307	IVANA GROC	YNNS	
	07/06/07	10:29	1,0	17.25	17.25	6004868123321009307	J D 248 FO	YNNS	
	07/06/07	11:02	1,0	11.00	11.00	6004868123321009307	J D 248 FO	YNNS	
	07/06/07	13:51	1,0	9.00	9.00	6004868123321009307	IVANA GROC	YNNK	
	07/08/07	12:04	1,0	10.09	10.09	6004868123321009307	IVANA GROC	YNNS	
	07/16/07	19:04	1,0	.77	.77	6004868123321009307	IVANA GROC	YNNS	
	08/02/07	:06	2,4	155.00	155.00	6004868123321009307	BENEFIT UPDAT	YNNS	
	08/02/07	10:26	1,0	39.94	39.94	6004868123321009307	IVANA GROC	YNNS	

Card #: 6004868123321009307  
EDA #: 936012208315Account Sts: 01  
Card Sts: 01

Start Date: 060107

Available Balance .06



Untitled

----- Transaction Information -----									
Se1	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	08/02/07	17:37	1,0	38.38	38.38	6004868123321009307	J D 248 FO	YNNS	
	08/02/07	17:43	1,0	56.25	56.25	6004868123321009307	IVANA GROC	YNNS	
	08/03/07	13:08	1,0	20.03	20.03	6004868123321009307	IVANA GROC	YNNK	
	08/21/07	10:08	0,0	.00	.00	6004868123321009307	IVANA GROC	YNNK	
	09/04/07	9:03	1,0 *	61.37	.00	6004868123321009307	IVANA GROC	N51S	
	09/04/07	9:10	1,0 *	1.99	.00	6004868123321009307	J D 248 FO	N51S	
	09/04/07	9:39	1,0 *	1.49	.00	6004868123321009307	GENAO GROC	N51S	
	09/05/07	:06	2,4	155.00	155.00	6004868123321009307	BENEFIT UPDAT	YNNS	
	09/05/07	9:23	1,0	124.22	124.22	6004868123321009307	WESTERN BE	YNNS	

James Carter  
11/12/07  
JAMES CARTER  
Notary Public, State of New York  
No. 01CA4987969  
Qualified in Bronx County  
Commission Expires Jan. 14, 20\_\_10

11/10/07

To whom it may Concern:

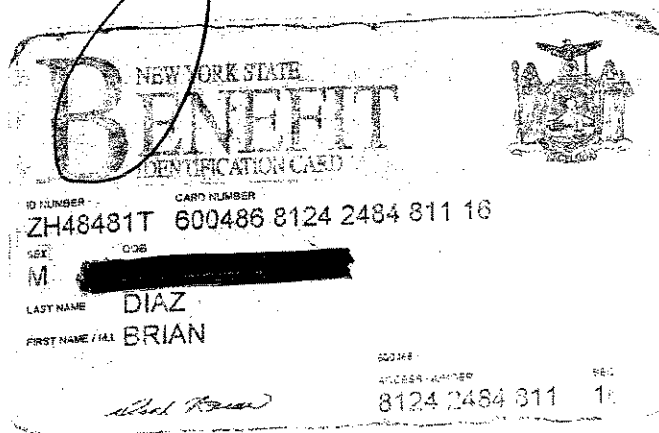
I'm writing this letter to let you know that Mr. Franklyn Lugo at Ivana Grocery Store located at 1665 Topping Ave. gives me credit every month throughout the month for food (milk, bread, eggs, He never gives me cigarettes or beer He gives me credit due to the fact I am a good customer and he helps me out for my kids. And I pay him back everytime I get my foodstamps

600486 8124 24/84  
811 16

Thank you  
Juan Diaz  
1360 Mernam Dr #30  
Bx Ny 10452

JAMES CARTER  
Notary Public, State of New York  
No. 01CA4987969  
Qualified in Bronx County  
Commission Expires Jan. 14, 20\_\_10

*James Carter*  
*11/12/07*



Untitled

Card #: 6004868124248481116

Svc Site: 66F15

Card Sts: 01

Primary/Alternate Indicator: 01  
 First Name Mi Last Name  
 BRIAN DIAZ

Address: 1360 MERRIAM AVENUE APT. 30 BRONX, NY. 10452

SocSec# Tele#

Date of Birth

EDA: 536002024072 Sts: 01,1,0 Type: 01

Last Transaction Information

Debit: 4.00 11/11/07 19:55:54

Credit: 111.00 11/09/07 00:06:02

\* Active

Available Balance: .10

Sel: x

EDA: 636002024088 Sts: 01,1,0 Type: 02

Last Transaction Information

Debit: 48.00 11/07/07 01:12:47

Credit: 50.00 11/06/07 00:06:10

\* Active

Available Balance: .00

Sel:

Card #: 6004868124248481116

Account Sts: 01

EDA #: 536002024072

Card Sts: 01

Start Date: 060107

Available Balance .10

## Transaction Information

Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	06/09/07	:06	2,4	104.00	104.00	6004868124248481116	BENEFIT UPDAT	YNNNS
	06/09/07	9:26	1,0	88.36	88.36	6004868124248481116	IVANA GROC	YNNK
	06/09/07	17:14	1,0	11.46	11.46	6004868124248481116	JTM MINI M	YNNK
	06/10/07	11:07	1,0	2.94	2.94	6004868124248481116	ESPINAL FO	YNNK
	06/12/07	11:32	1,0	1.10	1.10	6004868124248481116	FELINO GRO	YNNK
	07/10/07	:06	2,4	104.00	104.00	6004868124248481116	BENEFIT UPDAT	YNNNS
	07/10/07	9:21	1,0	101.22	101.22	6004868124248481116	IVANA GROC	YNNK
	07/10/07	9:23	0,0	.00	.00	6004868124248481116	IVANA GROC	YNNK
	07/10/07	14:29	1,0	2.90	2.90	6004868124248481116	LA BODEGUI	YNNK
	08/09/07	:06	2,4	104.00	104.00	6004868124248481116	BENEFIT UPDAT	YNNNS

Card #: 6004868124248481116

Account Sts: 01

EDA #: 536002024072

Card Sts: 01

Start Date: 060107

Available Balance .10

## Transaction Information

Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	08/09/07	10:03	1,0	51.25	51.25	6004868124248481116	PAURIANY #	YNNK
	08/09/07	11:31	1,0	49.98	49.98	6004868124248481116	IVANA GROC	YNNK
	08/09/07	18:32	1,0	2.79	2.79	6004868124248481116	1361 DELI	YNNK
	09/10/07	:06	2,4	104.00	104.00	6004868124248481116	BENEFIT UPDAT	YNNNS
	09/10/07	12:56	1,0	89.95	89.95	6004868124248481116	IVANA GROC	YNNK
	09/10/07	15:02	1,0	2.88	2.88	6004868124248481116	OH AND SON	YNNK
	09/10/07	16:37	1,0 *	11.24	.00	6004868124248481116	JLT 156 FO	N51K
	09/10/07	16:38	1,0	11.17	11.17	6004868124248481116	JLT 156 FO	YNNK
	10/10/07	:06	2,4	111.00	111.00	6004868124248481116	BENEFIT UPDAT	YNNNS

James Carter  
11/12/07  
JAMES CARTER  
Notary Public, State of New York  
No. 01CA4987969  
Qualified in Bronx County  
Commission Expires Jan. 14, 2010

11/1/07

To Whom It May Concern,

I am writing this letter in response to Mr. Franklin Surp.

The Grocery Store Channing on 193<sup>rd</sup> and Toppling.

We dealt with this store for almost 10 years and they are always there when I need them during the months when I have nothing in my way, good for credit which I always pay back during the beginning of the month. If we lose them the community would be at a loss.

Phonda Woods  
60048681212951

AS Stone  
718-770-1230

NEW YORK STATE  
**RENEWT**  
IDENTIFICATION CARD

ID NUMBER  
ZZ985197M

CARD NUMBER  
600496 8121 2951 972 07

SEX  
F

LAST NAME  
WOODS

FIRST NAME / MI  
RHONDA



ACCESS NUMBER  
8121 2951 972 07

*James Carter*  
11/12/07

JAMES CARTER  
Notary Public, State of New York  
No. 01CA4987969  
Qualified in Bronx County  
Commission Expires Jan. 14, 2010

Untitled

Card #: 6004868121295197207

Svc Site: 66046

Card Sts: 01

Primary/Alternate Indicator: 01

First Name Mi Last Name

RHONDA WOODS

Address: 1661 TOPPING AVE APT. 3D BRONX, NY. 10457

SocSec# Tele#  
[REDACTED] 718-716-1230Date of Birth  
[REDACTED]

EDA: 536028553773 Sts: 01,1,0 Type: 01

EDA: 636028553787 Sts: 01,1,0 Type: 02

Last Transaction Information

Last Transaction Information

Debit: 9.74 11/11/07 09:23:30

Debit: .50 11/15/07 16:19:02

Credit: 298.00 11/07/07 00:06:00

Credit: 50.00 11/14/07 00:06:13

\* Active

\* Active

Available Balance: .69

Available Balance: .31

Sel: x

Sel:

Card #: 6004868121295197207

Account Sts: 01

EDA #: 536028553773

Card Sts: 01

Start Date: 060107

Available Balance .69

## Transaction Information

Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	06/07/07	:06	2,4	284.00	284.00	6004868121295197306	BENEFIT UPDAT	YNNS
	06/07/07	8:36	1,0	104.59	104.59	6004868121295197306	IVANA GROC	YNNK
	06/07/07	9:56	1,0	10.84	10.84	6004868121295197306	ONSTAR DIS	YNNK
	06/07/07	10:41	1,0 *	169.99	.00	6004868121295197306	WESTERN BE	N51K
	06/07/07	10:43	1,0	169.05	169.05	6004868121295197306	WESTERN BE	YNNK
	07/07/07	:13	0,0	.00	.00	6004868121295197306	IVANA GROC	YNNK
	07/07/07	:34	0,0	.00	.00	6004868121295197306	IVANA GROC	YNNK
	07/07/07	:06	2,4	284.00	284.00	6004868121295197306	BENEFIT UPDAT	YNNS
	07/07/07	:48	1,0	3.75	3.75	6004868121295197306	IVANA GROC	YNNK
	07/07/07	9:46	1,0	103.28	103.28	6004868121295197306	IVANA GROC	YNNK

Card #: 6004868121295197207

Account Sts: 01

EDA #: 536028553773

Card Sts: 01

Start Date: 060107

Available Balance .69

## Transaction Information

Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	07/07/07	10:58	1,0 *	179.86	.00	6004868121295197306	FOOD BAZAA	N51K
	07/07/07	10:59	1,0	176.97	176.97	6004868121295197306	FOOD BAZAA	YNNK
	08/07/07	:06	2,4	284.00	284.00	6004868121295197306	BENEFIT UPDAT	YNNS
	08/07/07	9:22	1,0	69.58	69.58	6004868121295197306	IVANA GROC	YNNK
	08/07/07	10:13	1,0 *	217.71	.00	6004868121295197306	MANDG MEAT	N51K
	08/07/07	10:14	1,0	214.42	214.42	6004868121295197306	MANDG MEAT	YNNK
	09/07/07	:06	2,4	284.00	284.00	6004868121295197306	BENEFIT UPDAT	YNNS
	09/07/07	9:30	1,0	102.64	102.64	6004868121295197306	IVANA GROC	YNNK
	09/07/07	13:48	1,0	4.75	4.75	6004868121295197306	IVANA GROC	YNNK
	09/07/07	15:21	1,0	2.75	2.75	6004868121295197306	IVANA GROC	YNNK



11/10/07

To whom it may concern:

I am writing this letter to inform you that Mr. Franklyn Iugo at Ivana Grocery Store located at 1665 Topping Ave. gives me credit every month anytime during the month for food like milk, eggs, cereal. He never gives me credit for cigarettes or beer. Sometimes I need credit and he does me the favor and I pay him with Foodstamps.

Thank you  
Jermaine Robertson  
1384 Bristow St #2A  
Bx Ny 10459



**NEW YORK STATE**  
**BENEFIT**  
IDENTIFICATION CARD

ID NUMBER: ZN83524Y CARD NUMBER: 600486 8126 2835 244 11

SEX: F DOB: [REDACTED]



LAST NAME: ROBERTSON

FIRST NAME / MI: JENEVIEVE A

*Jenevieve A. Robertson*

800/86 ACCESS NUMBER: 8126 2835 244 11

SEOF



Untitled

Card #: 6004868126283524411

Svc Site: 66039

Card Sts: 01

Primary/Alternate Indicator: 01

First Name Mi Last Name

JENEVIEVE A ROBERTSON

Address: 1384 BRISTOW ST APT. 2A BRONX, NY. 10459

SocSec# Tele#

[REDACTED] 347-752-4890

Date of Birth

[REDACTED]

EDA: 536012718776 Sts: 01,1,0 Type: 01

EDA: 636012718780 Sts: 01,1,0 Type: 02

Last Transaction Information

Last Transaction Information

Debit: 7.07 11/19/07 17:51:36

Debit: 185.50 11/14/07 09:55:46

Credit: 580.00 11/14/07 00:06:03

Credit: 187.50 11/14/07 00:06:13

\* Active

\* Active

Available Balance: 364.71

Available Balance: .00

Sel: x

Sel:

Card #: 6004868126283524411

Account Sts: 01

EDA #: 536012718776

Card Sts: 01

Start Date: 060107

Available Balance

364.71

## Transaction Information

Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	06/14/07	:06	2,4	497.00	497.00	6004868126283524510	BENEFIT UPDAT	YNNK
	06/14/07	10:02	1,0	99.87	99.87	6004868126283524510	IVANA GROC	YNNK
	06/14/07	11:39	1,0	5.00	5.00	6004868126283524510	ESPINAL FO	YNNK
	06/14/07	12:11	1,0	5.88	5.88	6004868126283524510	1361 DELI	YNNK
	06/14/07	15:55	1,0	33.17	33.17	6004868126283524510	ASSOCIATED	YNNK
	06/14/07	17:10	1,0	1.98	1.98	6004868126283524510	JLT 156 FO	YNNK
	06/15/07	11:16	1,0	87.21	87.21	6004868126283524510	IVANA GROC	YNNK
	06/15/07	12:38	1,0	5.00	5.00	6004868126283524510	JTM MINI M	YNNK
	06/15/07	12:39	1,0	2.00	2.00	6004868126283524510	JTM MINI M	YNNK
	06/15/07	13:01	1,0	5.50	5.50	6004868126283524510	1361 DELI	YNNK

Card #: 6004868126283524411

Account Sts: 01

EDA #: 536012718776

Card Sts: 01

Start Date: 060107

Available Balance

364.71

## Transaction Information

Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	06/15/07	17:25	1,0	17.73	17.73	6004868126283524510	JLT 156 FO	YNNK
	06/16/07	16:09	1,0	156.17	156.17	6004868126283524510	WESTERN BE	YNNK
	06/16/07	17:01	1,0	1.00	1.00	6004868126283524510	ESPINAL FO	YNNK
	06/16/07	18:22	1,0	76.00	76.00	6004868126283524510	JLT 156 FO	YNNK
	07/13/07	:06	2,4	497.00	497.00	6004868126283524510	BENEFIT UPDAT	YNNK
	07/13/07	10:34	1,0	91.03	91.03	6004868126283524510	IVANA GROC	YNNK
	07/13/07	12:31	1,0	2.65	2.65	6004868126283524510	GENAO GROC	YNNK
	07/13/07	13:30	1,0	42.25	42.25	6004868126283524510	LA NUEVA G	YNNK
	07/13/07	20:42	1,0	133.40	133.40	6004868126283524510	WESTERN BE	YNNK
	07/14/07	8:29	1,0	3.50	3.50	6004868126283524510	ESPINAL FO	YNNK

Card #: 6004868126283524411

Account Sts: 01

EDA #: 536012718776

Card Sts: 01

Start Date: 060107

Available Balance

364.71

## Transaction Information

Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	07/14/07	16:49	1,0	1.69	1.69	6004868126283524510	1472 BOSTO	YNNK

Page 1

Untitled

07/15/07	17:44	1,0	*	2.50	.00	6004868126283524510	R.J.H. DEL	N55K
07/15/07	18:14	1,0		16.50	16.50	6004868126283524510	JOSTEPH CO	YNNK
07/16/07	13:09	1,0		51.50	51.50	6004868126283524510	IVANA GROC	YNNK
07/16/07	16:20	1,0		3.20	3.20	6004868126283524510	SANCHEZ 73	YNNK
07/16/07	17:24	1,0		2.50	2.50	6004868126283524510	PAURIANY #	YNNK
07/17/07	21:04	1,0		19.22	19.22	6004868126283524510	CHARISSE A	YNNK
07/17/07	21:06	2,0		1.00	1.00	6004868126283524510	CHARISSE A	YNNK
07/17/07	21:28	1,0		1.00	1.00	6004868126283524510	1361 DELI	YNNK
07/18/07	12:11	1,0		4.35	4.35	6004868126283524510	ESPINAL FO	YNNK

Card #: 6004868126283524411  
EDA #: 536012718776

Account Sts: 01  
Card Sts: 01

Start Date: 060107

Available Balance 364.71

----- Transaction Information -----

Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	07/18/07	19:47	1,0	12.41	12.41	6004868126283524510	JLT 156 FO	YNNK
	07/19/07	18:02	1,0	112.16	112.16	6004868126283524510	JLT 156 FO	YNNK
	07/19/07	18:40	1,0	1.00	1.00	6004868126283524510	1361 DELI	YNNK
	08/14/07	:06	2,4	432.00	432.00	6004868126283524510	BENEFIT UPDAT	YNNK
	08/14/07	1:13	1,0	10.75	10.75	6004868126283524510	UNIVERSITY	YNNK
	08/14/07	10:38	1,0	101.50	101.50	6004868126283524510	IVANA GROC	YNNK
	08/14/07	11:52	1,0	32.07	32.07	6004868126283524510	JLT 156 FO	YNNK
	08/14/07	19:59	1,0	50.50	50.50	6004868126283524510	PAURIANY #	YNNK
	08/14/07	20:37	1,0	5.84	5.84	6004868126283524510	LA BODEGUI	YNNK
	08/14/07	20:43	1,0	3.00	3.00	6004868126283524510	1361 DELI	YNNK

Card #: 6004868126283524411  
EDA #: 536012718776

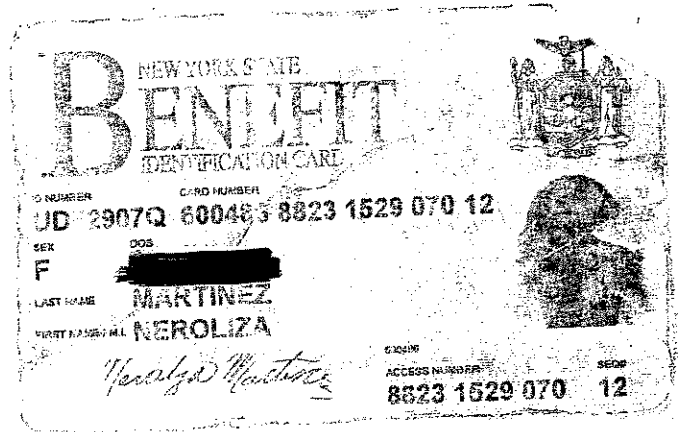
Account Sts: 01  
Card Sts: 01

Start Date: 060107

Available Balance 364.71

----- Transaction Information -----

Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	08/15/07	11:32	1,0	8.50	8.50	6004868126283524510	1361 DELI	YNNK
	08/15/07	13:52	1,0	59.93	59.93	6004868126283524510	IVANA GROC	YNNK
	08/15/07	20:35	1,0	6.98	6.98	6004868126283524510	1361 DELI	YNNK
	08/16/07	14:31	1,0	2.75	2.75	6004868126283524510	170TH STRE	YNNK
	08/16/07	17:18	1,0	4.39	4.39	6004868126283524510	1361 DELI	YNNK
	08/17/07	13:22	1,0	10.71	10.71	6004868126283524510	JLT 156 FO	YNNK
	08/17/07	19:54	1,0	5.68	5.68	6004868126283524510	1361 DELI	YNNK
	08/18/07	11:57	1,0	8.43	8.43	6004868126283524510	JLT 156 FO	YNNK
	08/18/07	15:38	1,0	2.25	2.25	6004868126283524510	PICHON #2	YNNK
	08/18/07	19:22	1,0	117.78	117.78	6004868126283524510	JLT 156 FO	YNNK



A quien pueda interesar:

El señor Franklyn Lugo, propietario de la bodega Ivona Grocers localizada en el 1665 Topping Ave me hace el favor de darme credito, el cual, yo pago mensual, de la Tarjeta de food Stamp. El cual incluye, leche, huevo, aceite, pan, jugo, manzanas, Papas, etc.

Cualquier informacion llamen al:  
1718-466-9568  
ATTN: Mr. Martinez

Untitled

Card #: 6004868823152907012

Svc Site: 66018

Card Sts: 01

Primary/Alternate Indicator: 01  
 First Name Mi Last Name  
 NEROLIZA MARTINEZ

Message: Y

Address: 1678 MONROE AVENUE APT. 2 BRONX, NY. 10457  
 SocSec# Tele#

Date of Birth

EDA: 736035495796 Sts: 01,1,0 Type: 01  
 Last Transaction Information  
 Debit: 12.07 11/16/07 18:44:00  
 Credit: 426.00 11/10/07 00:06:02

EDA: 836035495800 Sts: 01,1,0 Type: 02  
 Last Transaction Information  
 Debit: 17.07 11/18/07 18:29:11  
 Credit: 50.00 11/20/07 00:06:12

\* Active  
 Available Balance: 1.04

\* Active  
 Available Balance: 50.00

Card #: 6004868823152907012  
 EDA #: 736035495796

Account Sts: 01  
 Card Sts: 01

Start Date: 060107

Available Balance 1.04

Transaction Information									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	06/30/07	:06	2,4	404.00	404.00	6004868823152907111	BENEFIT UPDAT	YNNNS	
	06/30/07	:06	2,4	404.00	404.00	6004868823152907111	BENEFIT UPDAT	YNNNS	
	07/02/07	21:48	1,0	19.98	19.98	6004868823152907111	IVANA GROC	YNNK	
	07/03/07	11:11	1,0	30.77	30.77	6004868823152907111	J D 248 FO	YNNK	
	07/03/07	11:48	1,0	3.14	3.14	6004868823152907111	J D 248 FO	YNNK	
	07/03/07	22:03	1,0	19.79	19.79	6004868823152907111	IVANA GROC	YNNK	
	07/03/07	22:47	1,0	1.49	1.49	6004868823152907111	DUPRESS DE	YNNK	
	07/04/07	15:23	1,0	19.19	19.19	6004868823152907111	LIBERATO G	YNNK	
	07/04/07	19:03	1,0	21.89	21.89	6004868823152907111	IVANA GROC	YNNK	
	07/05/07	13:16	1,0	20.52	20.52	6004868823152907111	DUPRESS DE	YNNK	

Card #: 6004868823152907012  
 EDA #: 736035495796

Account Sts: 01  
 Card Sts: 01

Start Date: 060107

Available Balance 1.04

Transaction Information									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	07/05/07	17:58	1,0	194.36	194.36	6004868823152907111	J D 248 FO	YNNK	
	07/05/07	20:20	1,0	7.58	7.58	6004868823152907111	J D 248 FO	YNNK	
	07/06/07	16:17	1,0	5.00	5.00	6004868823152907111	DUPRESS DE	YNNK	
	07/08/07	16:48	1,0	18.39	18.39	6004868823152907111	J D 248 FO	YNNK	
	07/13/07	20:34	1,0	46.00	46.00	6004868823152907012	J D 248 FO	YNNNS	
	07/13/07	23:31	1,0	10.35	10.35	6004868823152907012	IVANA GROC	YNNNS	
	07/14/07	20:42	1,0	4.35	4.35	6004868823152907012	IVANA GROC	YNNNS	
	07/14/07	22:55	1,0	17.42	17.42	6004868823152907012	IVANA GROC	YNNNS	
	07/15/07	12:41	1,0	13.85	13.85	6004868823152907012	J D 248 FO	YNNNS	
	07/15/07	18:15	1,0	34.12	34.12	6004868823152907012	IVANA GROC	YNNNS	

Card #: 6004868823152907012  
 EDA #: 736035495796

Account Sts: 01  
 Card Sts: 01

Start Date: 060107

Available Balance 1.04

Transaction Information

Page 1

A.R. 60

Untitled

sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	07/15/07	18:20	1,0	3.00	3.00	6004868823152907012	DUPRESS DE	YNNS
	07/15/07	18:25	1,0	15.84	15.84	6004868823152907012	J D 248 FO	YNNS
	07/16/07	18:44	1,0	25.25	25.25	6004868823152907012	IVANA GROC	YNNK
	07/17/07	13:05	1,0	12.74	12.74	6004868823152907012	IVANA GROC	YNNS
	07/18/07	17:29	1,0	32.57	32.57	6004868823152907012	J D 248 FO	YNNK
	07/19/07	17:54	1,0	28.97	28.97	6004868823152907012	IVANA GROC	YNNS
	07/20/07	14:14	1,0	56.69	56.69	6004868823152907012	J D 248 FO	YNNS
	07/20/07	22:16	1,0	20.29	20.29	6004868823152907012	IVANA GROC	YNNS
	07/21/07	20:35	1,0	40.19	40.19	6004868823152907012	IVANA GROC	YNNK
	07/21/07	22:19	1,0	9.00	9.00	6004868823152907012	DUPRESS DE	YNNS

Card #: 6004868823152907012  
EDA #: 736035495796

Account Sts: 01  
Card Sts: 01

Start Date: 060107

Available Balance

1.04

----- Transaction Information -----

sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	07/22/07	17:31	1,0	4.00	4.00	6004868823152907012	IVANA GROC	YNNK
	07/22/07	23:04	1,0	11.95	11.95	6004868823152907012	DUPRESS DE	YNNS
	07/23/07	14:54	1,0	33.15	33.15	6004868823152907012	IVANA GROC	YNNS
	07/23/07	18:28	1,0	5.00	5.00	6004868823152907012	PAURIANY #	YNNS
	07/23/07	18:39	1,0	20.86	20.86	6004868823152907012	J D 248 FO	YNNS
	07/28/07	12:27	1,0 *	72.59	.00	6004868823152907012	J D 248 FO	N51S
	07/28/07	15:09	1,0 *	3.00	.00	6004868823152907509	IVANA GROC	N62K
	07/28/07	15:11	1,0 *	3.00	.00	6004868823152907509	IVANA GROC	N62K
	07/28/07	15:12	1,0 *	3.00	.00	6004868823152907509	IVANA GROC	N62K
	08/10/07	:06	2,4	404.00	404.00	6004868823152907012	BENEFIT UPDAT	YNNS

Card #: 6004868823152907012  
EDA #: 736035495796

Account Sts: 01  
Card Sts: 01

Start Date: 060107

Available Balance

1.04

----- Transaction Information -----

sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	08/11/07	12:55	1,0	38.08	38.08	6004868823152907012	IVANA GROC	YNNS
	08/11/07	14:09	1,0	7.49	7.49	6004868823152907012	J D 248 FO	YNNS
	08/11/07	20:41	1,0	38.99	38.99	6004868823152907012	IVANA GROC	YNNS
	08/12/07	17:41	1,0	14.24	14.24	6004868823152907012	IVANA GROC	YNNS
	08/12/07	18:00	1,0	1.99	1.99	6004868823152907012	IVANA GROC	YNNS
	08/12/07	23:09	1,0	4.50	4.50	6004868823152907012	DUPRESS DE	YNNS
	08/12/07	23:26	1,0	13.69	13.69	6004868823152907012	PAURIANY #	YNNS
	08/13/07	12:02	1,0	12.08	12.08	6004868823152907012	J D 248 FO	YNNS
	08/13/07	23:15	1,0	19.64	19.64	6004868823152907012	IVANA GROC	YNNS
	08/14/07	12:43	1,0	3.50	3.50	6004868823152907012	IVANA GROC	YNNS

Card #: 6004868823152907012  
EDA #: 736035495796

Account Sts: 01  
Card Sts: 01

Start Date: 060107

Available Balance

1.04

----- Transaction Information -----

sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	08/14/07	12:50	1,0	11.98	11.98	6004868823152907012	J D 248 FO	YNNS
	08/14/07	12:58	1,0	2.00	2.00	6004868823152907012	J D 248 FO	YNNS
	08/14/07	23:36	1,0	20.00	20.00	6004868823152907012	DUPRESS DE	YNNK
	08/15/07	14:14	1,0	9.19	9.19	6004868823152907012	J D 248 FO	YNNS
	08/15/07	22:17	1,0	4.75	4.75	6004868823152907012	BX DELI GR	YNNK
	08/16/07	11:22	1,0	11.05	11.05	6004868823152907012	J D 248 FO	YNNS
	08/16/07	12:56	1,0	9.94	9.94	6004868823152907012	IVANA GROC	YNNK



Untitled

08/16/07 15:59 1,0	2.25	2.25	6004868823152907012	IVANA GROC	YNNNS
08/16/07 16:46 1,0	6.54	6.54	6004868823152907012	R.J.H. DEL	YNNNS
08/16/07 19:20 1,0	9.07	9.07	6004868823152907012	J D 248 FO	YNNNS

Card #: 6004868823152907012  
 EDA #: 736035495796

Account Sts: 01  
 Card Sts: 01

Start Date: 060107

Available Balance 1.04

----- Transaction Information -----								
sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC
	08/16/07	23:29	1,0	16.46	16.46	6004868823152907012	IVANA GROC	YNNK
	08/16/07	23:48	1,0	2.35	2.35	6004868823152907012	BX DELI GR	YNNK
	08/17/07	13:15	1,0	135.36	135.36	6004868823152907012	J D 248 FO	YNNNS
	08/17/07	13:21	1,0	8.95	8.95	6004868823152907012	IVANA GROC	YNNK
	09/06/07	14:31	1,0 *	40.11	.00	6004868823152907012	J D 248 FO	N51K
	09/11/07	:06	2,4	404.00	404.00	6004868823152907012	BENEFIT UPDAT	YNNNS
	09/11/07	14:10	1,0	154.11	154.11	6004868823152907012	J D 248 FO	YNNNS
	09/11/07	22:23	1,0	10.29	10.29	6004868823152907012	IVANA GROC	YNNK
	09/12/07	20:03	1,0	12.28	12.28	6004868823152907012	IVANA GROC	YNNNS
	09/12/07	21:44	1,0	6.99	6.99	6004868823152907012	IVANA GROC	YNNK

11-09-07

To Whom it may concern

my name is Marshall Tucker and  
I live at 346 East 173<sup>th</sup> Bronx, NY  
For the last 8 year.

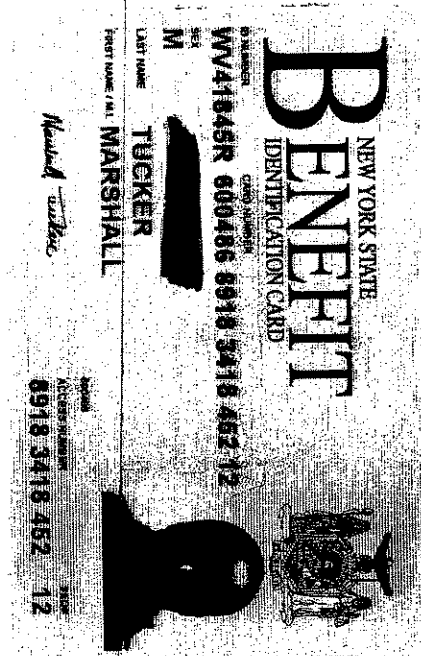
And I have been going to Mr. Franklyn's  
Grocery Store, and he have give me  
Credit for Appox. 6 year. I pay him at the  
end of Month with my (Food Card Stamp)

JAMES CARTER  
Notary Public, State of New York  
No. 01CA4987969  
Qualified in Bronx County  
Commission Expires Jan. 14, 20\_\_10

Thank you  
Marshall Tucker

James Carter  
11/12/07





**JAMES CARTER**  
Notary Public, State of New York  
No. 01CA4987969  
Qualified in Bronx County  
Commission Expires Jan. 14, 2010

*James Carter*  
*11/12/07*

Untitled

Card #: 6004868918341845212 Svc Site: 66F46 Card Sts: 01

Primary/Alternate Indicator: 01  
First Name Mi Last Name  
MARSHALL TUCKERAddress: 346 E 173RD ST APT. 3E BRONX, NY. 10457  
SocSec# Tele# Date of Birth

EDA: 136013660634 Sts: 01,1,0 Type: 01	EDA: 236013660648 Sts: 01,1,0 Type: 02
Last Transaction Information	Last Transaction Information
Debit: 3.50 11/13/07 08:25:09	Debit: 6.75 11/18/07 14:18:28
Credit: 162.00 11/09/07 00:06:02	Credit: 68.50 11/17/07 00:06:12
* Active	* Active
Available Balance: .08	Available Balance: .25
Sel: x	Sel:

Card #: 6004868918341845212 Account Sts: 01  
EDA #: 136013660634 Card Sts: 01

Start Date: 060107 Available Balance .08

Transaction Information									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	06/09/07	:06	2,4	155.00	155.00	6004868918341845311	BENEFIT UPDAT	YNNS	
	06/09/07	8:07	1,0	5.37	5.37	6004868918341845311	GENAO GROC	YNNS	
	06/09/07	13:44	1,0	9.25	9.25	6004868918341845311	GENAO GROC	YNNS	
	06/09/07	15:45	1,0	47.68	47.68	6004868918341845311	IVANA GROC	YNNK	
	06/09/07	17:40	1,0	28.03	28.03	6004868918341845311	IVANA GROC	YNNK	
	06/09/07	17:42	1,0	13.56	13.56	6004868918341845311	IVANA GROC	YNNS	
	06/09/07	19:28	1,0	49.88	49.88	6004868918341845311	IVANA GROC	YNNS	
	06/10/07	11:32	1,0	1.00	1.00	6004868918341845311	MINS FISH	YNNK	
	07/10/07	:06	2,4	155.00	155.00	6004868918341845212	BENEFIT UPDAT	YNNS	
	07/10/07	9:15	1,0	31.50	31.50	6004868918341845212	IVANA GROC	YNNK	

Card #: 6004868918341845212 Account Sts: 01  
EDA #: 136013660634 Card Sts: 01

Start Date: 060107 Available Balance .08

Transaction Information									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	07/10/07	10:08	1,0	109.77	109.77	6004868918341845212	J D 248 FO	YNNS	
	07/10/07	10:17	1,0	8.38	8.38	6004868918341845212	IVANA GROC	YNNS	
	07/10/07	16:07	1,0	5.75	5.75	6004868918341845212	GENAO GROC	YNNS	
	08/09/07	:06	2,4	155.00	155.00	6004868918341845212	BENEFIT UPDAT	YNNS	
	08/09/07	8:50	1,0	16.01	16.01	6004868918341845212	IVANA GROC	YNNS	
	08/09/07	8:58	1,0	3.00	3.00	6004868918341845212	GENAO GROC	YNNS	
	08/09/07	9:00	1,0	3.00	3.00	6004868918341845212	GENAO GROC	YNNS	
	08/09/07	9:47	1,0	8.98	8.98	6004868918341845212	IVANA GROC	YNNS	
	08/09/07	11:03	1,0	12.11	12.11	6004868918341845212	IVANA GROC	YNNS	
	08/09/07	14:37	1,0	3.50	3.50	6004868918341845212	IVANA GROC	YNNK	

Card #: 6004868918341845212 Account Sts: 01  
EDA #: 136013660634 Card Sts: 01

Start Date: 060107 Available Balance .08

## Untitled

Transaction Information									
sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	08/09/07	15:31	1,0	49.72	49.72	6004868918341845212	IVANA GROC	YNNS	
	08/09/07	15:45	1,0	58.41	58.41	6004868918341845212	J D 248 FO	YNNS	
	09/10/07	:06	2,4	155.00	155.00	6004868918341845212	BENEFIT UPDAT	YNNS	
	09/10/07	11:18	1,0	2.50	2.50	6004868918341845212	LICEY GROC	YNNS	
	09/10/07	11:43	1,0	53.72	53.72	6004868918341845212	J AND J ME	YNNS	
	09/10/07	11:50	1,0	33.16	33.16	6004868918341845212	MINS FISH	YNNK	
	09/10/07	12:53	1,0	5.00	5.00	6004868918341845212	GENAO GROC	YNNS	
	09/10/07	13:45	1,0	2.50	2.50	6004868918341845212	IVANA GROC	YNNS	
	09/10/07	14:40	1,0	7.50	7.50	6004868918341845212	J D 248 FO	YNNK	
	09/10/07	14:53	1,0	13.27	13.27	6004868918341845212	IVANA GROC	YNNS	

to let you if may concern -  
This is Mario Gonzalez  
Card number - 600486 8123 286691305-  
I'm writing to let you know.  
That Mr. Franklyn Lugo At  
JUANITA Grocery Store - gives  
me Credit He gives me  
Food. Nut Beer or Cigarette  
He really helps me out  
when I need it And I Always  
pay him when my food stuffs  
come in Thank you.

Mario Gonzalez  
703 Huntspoint Ave, Bronx  
10474.  
Phone. 718. 708 6653

JAMES CARTER  
Notary Public, State of New York  
No. 01CA4987969  
Qualified in Bronx County  
Commission Expires Jan. 14, 2010

James Carter  
11/12/07

Untitled

Card #: 6004868123286691305

Svc Site: 66F40

Card Sts: 01

Primary/Alternate Indicator: 01

First Name Mi Last Name  
MARIO GONZALEZ

Address: 743 HUNTS POINT AVE. APT. 000 BRONX, NY. 10474

SorSec# Tele#

Date of Birth

EDA: 936046650918 Sts: 01,1,0 Type: 01

EDA: 036046650921 Sts: 01,1,D Type: 02

Last Transaction Information

Last Transaction Information

Debit: 56.00 11/08/07 00:43:55

Debit: 20.10 08/24/07 01:54:01

Credit: 129.00 11/07/07 20:00:24

Credit: 20.10 08/24/07 00:06:12

\* Active

\* Active

Available Balance: .01

Available Balance: .00

Sel: x

Sel:

Card #: 6004868123286691305

Account Sts: 01

EDA #: 936046650918

Card Sts: 01

Start Date: 060107

Available Balance .01

Transaction Information									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	06/08/07	:06	2,4	155.00	155.00	6004868123286691404	BENEFIT UPDAT	YNNNS	
	06/08/07	10:15	1,0	11.98	11.98	6004868123286691404	PAURIANY #	YNNK	
	06/08/07	10:16	1,0	11.98	11.98	6004868123286691404	PAURIANY #	YNNK	
	06/08/07	10:15	1,0 *	11.98	.00	6004868123286691404	PAURIANY #	MNNK	
	06/08/07	13:18	1,0	79.46	79.46	6004868123286691404	IVANA GROC	YNNNS	
	06/08/07	15:16	1,0	60.00	60.00	6004868123286691404	DUPRESS DE	YNNNS	
	06/08/07	18:31	1,0	3.25	3.25	6004868123286691404	GENAO GROC	YNNNS	
	06/26/07	15:20	1,0 *	1.20	.00	6004868123286691404	J D 248 FO	N51S	
	07/09/07	:06	2,4	155.00	155.00	6004868123286691404	BENEFIT UPDAT	YNNNS	
	07/09/07	11:18	1,0	49.88	49.88	6004868123286691404	IVANA GROC	YNNNS	

Card #: 6004868123286691305

Account Sts: 01

EDA #: 936046650918

Card Sts: 01

Start Date: 060107

Available Balance .01

Transaction Information									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	07/09/07	13:16	1,0	70.00	70.00	6004868123286691404	DUPRESS DE	YNNNS	
	07/09/07	13:18	1,0	5.00	5.00	6004868123286691404	DUPRESS DE	YNNNS	
	07/09/07	16:31	1,0	30.25	30.25	6004868123286691404	PAURIANY #	YNNNS	
	08/08/07	:06	2,4	155.00	155.00	6004868123286691404	BENEFIT UPDAT	YNNNS	
	08/08/07	1:03	1,0	70.20	70.20	6004868123286691404	RIVAS GROC	YNNK	
	08/08/07	1:07	1,0	70.20	70.20	6004868123286691404	RIVAS GROC	YNNK	
	08/08/07	8:06	1,0	15.00	15.00	6004868123286691404	PAURIANY #	YNNNS	
	09/08/07	:06	2,4	155.00	155.00	6004868123286691404	BENEFIT UPDAT	YNNNS	
	09/08/07	5:45	1,0	.50	.50	6004868123286691404	RIVAS GROC	YNNNS	
	09/08/07	13:32	1,0	49.88	49.88	6004868123286691404	IVANA GROC	YNNK	

11/10/07

To whom it may concern

Mr. Franklyn Lugo  
Gives me and my family  
Credit when we have no  
money by the end of the  
month. He does not credit  
me beer or cigarettes just  
meat juice & food for my  
family. And he allows  
me to pay him when I  
get my check or food stamps

Patricia Bullock  
347 E 173rd apt 4D  
1-646-245-6341

Card Number. 60048681211066  
58207

JAMES CARTER  
Notary Public, State of New York  
No. 01CA4987969  
Qualified in Bronx County  
Commission Expires Jan. 14, 2010

James Carter  
11/12/07



Untitled

Card #: 6004868121106658207

Svc Site: 66046

Card Sts: 01

Primary/Alternate Indicator: 01

First Name Mi Last Name  
PATRICIA I BULLOCK

Address: 347 E 173RD ST APT. 4D BRONX, NY. 10457

SocSec# Tele#

Date of Birth

EDA: 536008604772 Sts: 01,1,0 Type: 01

Last Transaction Information

Debit: 3.40 11/16/07 12:39:20

Credit: 339.00 11/08/07 00:06:02

\* Active

Available Balance: .00

Sel: x

EDA: 636008604788 Sts: 01,1,0 Type: 02

Last Transaction Information

Debit: 117.00 11/08/07 08:34:52

Credit: 119.00 11/08/07 00:06:12

\* Active

Available Balance: .00

Sel:

Card #: 6004868121106658207

EDA #: 536008604772

Account Sts: 01

Card Sts: 01

Start Date: 060107

Available Balance .00

----- Transaction Information -----									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	06/08/07	:06	2,4	310.00	310.00	6004868121106658207	BENEFIT UPDAT	YNNK	
	06/08/07	2:57	1,0	204.97	204.97	6004868121106658207	PATHMARK #	YNNK	
	06/08/07	8:42	1,0	48.53	48.53	6004868121106658207	GENAO GROC	YNNK	
	06/09/07	15:42	1,0	57.00	57.00	6004868121106658207	WESTERN BE	YNNK	
	07/09/07	:06	2,4	310.00	310.00	6004868121106658207	BENEFIT UPDAT	YNNK	
	07/09/07	7:33	1,0	20.77	20.77	6004868121106658207	GENAO GROC	YNNK	
	07/09/07	9:49	1,0	239.45	239.45	6004868121106658207	WESTERN BE	YNNK	
	07/09/07	10:35	1,0 *	51.50	.00	6004868121106658207	IVANA GROC	N51K	
	07/09/07	10:38	1,0	49.93	49.93	6004868121106658207	IVANA GROC	YNNK	
	08/08/07	:06	2,4	310.00	310.00	6004868121106658207	BENEFIT UPDAT	YNNK	

Card #: 6004868121106658207

EDA #: 536008604772

Account Sts: 01

Card Sts: 01

Start Date: 060107

Available Balance .00

----- Transaction Information -----									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	08/08/07	6:52	1,0	9.65	9.65	6004868121106658207	ANA MARIZ	YNNK	
	08/08/07	8:43	1,0	20.94	20.94	6004868121106658207	GENAO GROC	YNNK	
	08/08/07	12:16	1,0	61.50	61.50	6004868121106658207	GENAO GROC	YNNK	
	08/08/07	15:03	1,0	18.00	18.00	6004868121106658207	GENAO GROC	YNNK	
	08/08/07	16:04	1,0	160.59	160.59	6004868121106658207	WESTERN BE	YNNK	
	08/08/07	20:08	1,0	24.50	24.50	6004868121106658207	IVANA GROC	YNNK	
	08/09/07	14:42	1,0 *	7.18	.00	6004868121106658207	GENAO GROC	N55K	
	08/09/07	14:43	1,0	7.18	7.18	6004868121106658207	GENAO GROC	YNNK	
	08/12/07	11:25	1,0	4.49	4.49	6004868121106658207	J D 248 FO	YNNK	
	08/12/07	11:29	1,0	3.30	3.30	6004868121106658207	J D 248 FO	YNNK	

**UNABLE TO MATCH TO ADMINISTRATIVE TERMINAL**



TO Whom IT MAY CONCERN  
I Sell well  
MR. FRANKLIN MUGO  
AT IVANA GROUP STORE  
give me credit until  
my Food Stamp come  
I pay MR. FRANKLIN MUGO  
AT THE middle of  
THE MONTH. well  
I get my check  
HE give me milk  
bread HE never  
give beer on credit  
never.

For

well

# 004868122 2999

483 14

Untitled

Card #: 6004868122299948314

Svc Site: 66F46

Card Sts: 01

Primary/Alternate Indicator: 01  
 First Name Mi Last Name  
 MARSHALL TUCKER

Address: 346 E 173RD ST APT. 3E BRONX, NY. 10457

SocSec# Tele#

Date of Birth

EDA: 136013660634 Sts: 01,1,0 Type: 01

EDA: 236013660648 Sts: 01,1,0 Type: 02

Last Transaction Information

Last Transaction Information

Debit: 3.50 11/13/07 08:25:09

Debit: 6.75 11/18/07 14:18:28

Credit: 162.00 11/09/07 00:06:02

Credit: 68.50 11/17/07 00:06:12

\* Active

\* Active

Available Balance: .08

Available Balance: .25

Sel: x

Sel:

Card #: 6004868122299948314

Account Sts: 01

EDA #: 136008821738

Card Sts: 01

Start Date: 060107

Available Balance .21

Transaction Information									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	06/06/07	:06	2,4	175.00	175.00	6004868122299948314	BENEFIT UPDAT	YNNS	
	06/07/07	10:00	1,0	50.89	50.89	6004868122299948314	PAURIANY #	YNNK	
	06/07/07	11:14	1,0	118.89	118.89	6004868122299948314	J D 248 FO	YNNS	
	06/07/07	11:16	1,0	5.00	5.00	6004868122299948314	J D 248 FO	YNNS	
	06/07/07	11:18	2,0	5.00	5.00	6004868122299948314	J D 248 FO	YNNS	
	06/07/07	11:19	1,0	3.69	3.69	6004868122299948314	J D 248 FO	YNNS	
	07/06/07	:06	2,4	182.00	182.00	6004868122299948314	BENEFIT UPDAT	YNNS	
	07/07/07	:22	1,0	31.62	31.62	6004868122299948314	IVANA GROC	YNNS	
	07/07/07	15:53	1,0	145.77	145.77	6004868122299948314	WESTERN BE	YNNS	
	08/06/07	:06	2,4	182.00	182.00	6004868122299948314	BENEFIT UPDAT	YNNS	

Card #: 6004868122299948314

Account Sts: 01

EDA #: 136008821738

Card Sts: 01

Start Date: 060107

Available Balance .21

Transaction Information									
Sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	08/07/07	11:30	1,0	181.00	181.00	6004868122299948314	J D 248 FO	YNNS	
	08/07/07	11:31	1,0	7.14	7.14	6004868122299948314	J D 248 FO	YNNS	
	09/06/07	:06	2,4	182.00	182.00	6004868122299948314	BENEFIT UPDAT	YNNS	
	09/06/07	23:48	1,0	39.98	39.98	6004868122299948314	IVANA GROC	YNNS	
	09/06/07	23:52	1,0	19.75	19.75	6004868122299948314	IVANA GROC	YNNS	
	09/07/07	15:29	0,0	.00	.00	6004868122299948314	J D 248 FO	YNNS	
	09/07/07	15:45	1,0	82.32	82.32	6004868122299948314	J D 248 FO	YNNS	
	09/07/07	15:55	1,0	29.51	29.51	6004868122299948314	J D 248 FO	YNNS	
	09/08/07	11:35	1,0	10.22	10.22	6004868122299948314	IVANA GROC	YNNS	
	10/05/07	:06	2,4	196.00	196.00	6004868122299948314	BENEFIT UPDAT	YNNS	

none +  
 card number  
 did not  
 match

11/7/07

To whom it may concern

I Carmen Ruiz live at  
1654 Monroe Ave Apt 2C  
Box NY 10457.

Mr Franklyn Lugo  
owner Grocery Store  
1665 Topping Ave  
Box NY 10457.

Mr Lugo gives me  
credit in the store and  
I pay him monthly amounts  
he gives me milk and eggs  
which ever I need to eat.

# 680486 81241846 11015

Yours

Carmen Ruiz

Search Type: 05 Program Type: 01 Value: \_\_\_\_\_

L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
RUI Z	CARLOS	1 KEENE	P1	YQ34063H	6004868931134063315
RUI Z	CARLOS	727 E 141TH ST	P1	QV59098T	6004868118359098909
RUI Z	CARLOS	413 E 152	P1	ZS32133U	6004868127332133105
RUI Z	CARLOS	317 RI VERSI DE A	P1	BS17262D	6004868227317262406
RUI Z	CARLOS	50 MAPLE PL	P1	CQ10195Q	6004862002621698900
RUI Z	CARLOTA	432 E. 13	P1	SH39715E	6004868734239715502
RUI Z	CARLY	115 FLOCK LA	P1	DK16931Q	6004868315216931302
RUI Z	CARMELA	11- 15 NEW M	P1	ZH55256E	6004868124255256013
RUI Z	CARMELO	104- 43 164TH	P1	SC18738Z	6004868732318738502
RUI Z	CARMEN	2085 WALTO	P1	ZK84191F ✓	6004868125284191113
RUI Z	CARMEN	482 MASON	P1	UJ93571C	6004868825193571905
RUI Z	CARMEN	431 E. 10	P1	ZJ02851V	6004868125102851302
RUI Z	CARMEN	960 SHERI	P1	YZ95802Q	6004868931295802113
RUI Z	CARMEN	142- 25 111 A	P1	ZU43112P	6004868128243112709

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eady for input

F7- ExpCD F8- Rd F2- ExpCS F6- Nx SF4- SEL SF6- Cd I n f o

Search Type: 05 Program Type: 01 Value: \_\_\_\_\_

L	L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
	DECL ET	CARMEN	1760 MADI S	P1	ZX28572B	6004868129228572305
	RUI Z	CARMEN	99-60 63 RD	P1	ZB18852R	6004868122218852811
	RUI Z	CARMEN	63 ROSEDALE ST	P1	ZW43453D	6004868129143453318
	RUI Z	CARMEN	645 WESTC	P1	ZZ98393A	6004868121298393712
	RUI Z	CARMEN	303 VERN O	P1	ZH56473T	6004868124256473815
	RUI Z	CARMEN	2730 DECAT	P1	ZG36114G	6004868124136114217
	RUI Z	CARMEN	625 E 234 ST	P1	ZG23534A	6004868124123534419
	RUI Z	CARMEN	111 22 42AVE	P1	ZV28364H	6004868128328364613
	RUI Z	CARMEN	4109 7TH	P1	ZR28795M	6004868127228795322
	RUI Z	CARMEN	88-71 ELDER	P1	ZS58595E	6004868127358595914
	RUI Z	FRANCI A	88-71 ELDERT LA	A1	ZS58595E	6004861127358595101
	RUI Z	CARMEN	450 SENAT	P1	ZP64106V	6004868127164106617
	RUI Z	CARMEN	5319 6TH AVE	P1	ZN89376K	6004868126289376014
	RUI Z	CARMEN	1145 NOBLE	P1	WU29106S	6004868918229106612

ready for input

F7-ExpCD F8-Rd F2-ExpCS F6-Nx SF4-SEL SF6-Cd I n f o

Search Type: 05 Program Type: 01 Value: \_\_\_\_\_

L	L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
RUI Z	CARMEN	2890	WEST	P1	ZR64056T	6004868127264056613
RUI Z	CARMEN	2000	WASHI NGTON	P1	ZY10066V	6004868129310066414
RUI Z	CARMEN	404	SOUND	P1	VB10586R	6004868832210586502
RUI Z	CARMEN	2088	MOHEG	P1	ZN70546X	6004868126270546013
RUI Z	CARMEN	1230	E TRE	P1	ZT85877M	6004868128185877913
RUI Z	CARMEN	431	W 17T	P1	ZH25477F	6004868124225477814
RUI Z	CARMEN	193	ALBANY	P1	ZP63647Z	6004868127163647116
RUI Z	CARMEN	2253	EAST	P1	ZE15217T	6004868123215217313
RUI Z	CARMEN	1440	BRONX	P1	YZ88977X	6004868931288977013
RUI Z	CARMEN	150-49	LI NDE	P1	ZN67748P	6004868126267748713
RUI Z	CARMEN	26	MADI S	P1	ZH53429D	6004868124253429919
RUI Z	CARMEN	655	WEST	P1	YY84919H	6004868939384919813
RUI Z	CARMEN	2035	MARM	P1	ZZ75379T	6004868121275379023
RUI Z	CARMEN	362	SUTTE	P1	YP36979X	6004868937136979614

ready for input

F7- ExpCD F8- Rd F2- ExpCS F6- Nx SF4- SEL SF6- Cd I n f o

Search Type: 05 Program Type: 01 Value: \_\_\_\_\_

L	L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
	RUI Z	CARMEN	590 SOUTH	P1	ZG74539Y	6004868124174539218
	RUI Z	CARMEN	1651 GARFI	P1	ZP55189W	6004868127155189721
	ORI TZ	CARMEN	289 BLEEC	P1	ZP59030B	6004868127159030517
	RUI Z	CARMEN	1950 DALY	P1	ZZ56540K	6004868121256540114
	RUI Z	CARMEN	641 CROWN	P1	YJ66370T	6004868935166370225
	RUI Z	CARMEN	97 EUCLI	P1	WE27930M	6004868913227930410
	RUI Z	CARMEN	2940 GRAND	P1	ZE75932A	6004868123275932207
	RUI Z	CARMEN	550 WEST	P1	WQ62910S	6004868911162910702
	RUI Z	CARMEN	90-38 170 S	P1	ZV10584F	6004868128310584913
	RUI Z	CARMEN	53-08 102ND	P1	WW87875J	6004868918387875610
	RUI Z	CARMEN	711B SEAGI	P1	VN75378S	6004868836275378507
	PONCE	CARMEN	100 W 93R	P1	ZH69334E	6004868124269334616
	RUI Z	CARMEN	100 W 93R	A1	ZH69334E	6004861124269334001
	CASTI LLO	CARMEN	65 E 193 S	P1	XC68160M	6004868922368160703

ready for input

F7-ExpCD F8-Rd F2-ExpCS F6-Nx SF4-SEL SF6-Cd Info



Search Type: 05 Program Type: 01 Value: \_\_\_\_\_

L	L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
	RUI Z	CARMEN	65 E 193 S	A1	XC68160M	6004861922368160601
	RUI Z	CARMEN	2375 MARRI	P1	ZZ68626C	6004868121268626414
	RUI Z	CARMEN	101 WEST	P1	ZH75131P	6004868124275131014
	RUI Z	CARMEN	11 E 199 STREET	P1	ZK56877K	6004868125256877814
	RUI Z	CARMEN	3940 BRONX	P1	TV78092M	6004868818378092201
	VERA	CARMEN	76 SUYDA	P1	TU71624B	6004868818271624902
	RUI Z	CARMEN	2920 CI ALELLA P	P1	ZZ54960B	6004868121254960207
	RUI ZVARGAS	CARMEN	1455 BRYAN	P1	WQ68601R	6004868911168601313
	RUI Z	CARMEN	36 LOCUST AVE	P1	DD39431D	6004868313139431302
	RUI Z	CARMEN	947 POND ST AP	P1	CU03782C	6004868238203782001
	RUI Z	CARMEN	545 SOUTH ST AP	P1	AF15185S	6004868213315185906
	RUI Z	CARMEN	2401 LACONI A AV	P1	AK45965Y	6004868215245965406
	RUI Z	CARMEN	359 GARSON AVE	P1	DB95905Q	6004868312295905604
	RUI Z	CARMEN	31 SIXTH STREET	P1	CJ70126G	6004868235170126113

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ready for input

F7- ExpCD F8- Rd F2- ExpCS F6- Nx SF4- SEL SF6- Cd Info



Search Type: 05 Program Type: 01 Value: \_\_\_\_\_

L	L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
	RUI Z	CARMEN	204 LINDEN AVE	P1	AG08236R	6004868214108236104
	RUI Z	CARMEN	66 E. MAIN ST. A	P1	AR31366E	6004868217231366904
	RUI Z	CARMEN	315 HAMILTON	P1	DC66897X	6004868312366897201
	RUI Z	CARMEN	66 68 ELLIOT ST	P1	BX86307M	6004868229286307014
	RUI Z	CARMEN	398 SHELF	P1	WC59023N	6004868912359023606
	SEI N	CARMEN	912 AMSTE	P1	UU16122G	6004868828216122003
	RUI Z	CARMEN	689 E 233	P1	WJ67181P	6004868918267181303
	GORDON	JOYCE	72 WORTH AVENUE	P1	AT52611K	6004868218152611203
	RUI Z	CARMEN	72 WORTH AVENUE	A1	AT52611K	6004861218152611101
	RUI Z	CARMEN	152 W 2ND ST	P1	DG89225J	6004868314189225701
	RUI Z	CARMEN	94-05 222ND	P1	YR60668R	6004868937260668314
	RUI Z	CARMEN	185 TROGG	P1	VP79464G	6004868837179464302
	RUI Z	CARMEN	795 HI CKS	P1	ZP34546X	6004868127134546306
	RUI Z	CARMEN	142 HI GHL	P1	ZS03677M	6004868127303677619

ready for input

F7-ExpCD F8-Rd F2-ExpCS F6-Nx SF4-SEL SF6-Cd Info

Search Type: 05 Program Type: 01 Value: \_\_\_\_\_

L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
RUI Z	CARMEN	975 STRONG ST A	P1	CJ37209T	6004868235137209002
RUI Z	CARMEN	60 AVENUE D	P1	UQ07923F	6004868821107923605
RUI Z	CARMEN	350 ST. A	P1	ZS61262N	6004868127361262114
RUI Z	CARMEN	2695 CONEY	P1	SA46390V	6004868732146390203
RUI Z	CARMEN	840 COLUM	P1	ZH74344C	6004868124274344113
RUI Z	CARMEN	1071 COLGATE AV	P1	ZR96658X	6004868127296658113
RUI Z	CARMEN	144 SOUTH SI CTH	P1	DV65507S	6004868318365507501
RUI ZPI NEDA	CARMEN	2185 DAVI	P1	SC11668S	6004868732311668003
RUI Z	CARMEN	PO BOX 359	P1	ZT35089W	6004868128135089916
RUI Z	CARMEN	161 BEACH	P1	YD08485R	6004868933108485607
RUI Z	CARMEN	57 A HILL COURT	P1	BQ25512P	6004868221125512201
TAVAREZ	CARMEN	2034 GRAND	P1	UJ46625D	6004868825146625907
RUI Z	CARMEN	185 THROG	P1	RG43633N	6004868724143633701
RUI Z	CARMEN	3711 LAKE ROAD	P1	DMB5562P	6004868316185562102

ready for input

F7-ExpCD F8-Rd F2-ExpCS F6-Nx SF4-SEL SF6-Cd Info

## Client Search

Search Type: 05 Program Type: 01 Value: \_\_\_\_\_

SL	L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
-	RUI Z	CARMEN	50- 21 102ND	P1	RE21951A	6004868723221951902
-	RUI Z	CARMEN	5 TENEY	P1	QY14273N	6004868119314273702
-	RUI Z	CARMEN	4 E 28T	P1	YF17665A	6004868933317665817
-	RUI Z	CARMEN	370 WADSW	P1	QT58485A	6004868118158485703
-	RUI Z	CARMEN	398 OLIVE	P1	ZZ56693Y	6004868121256693913
-	RUI Z	CARMEN	769 BRYAN	P1	QP12907J	6004868117112907901
-	RUI Z	CARMEN	1527 LEALN	P1	RU08409S	6004868728208409303
-	RUI Z	CARMEN	42 HAZZARD ST A	P1	ED19167J	6004868323119167701
-	RUI Z	CAROL	142 BARUC	P1	YJ66368E	6004868935166368617
-	RUI Z	CAROL	95 TEN E	P1	SG26572J	6004868734126572503
-	RUI Z	CAROLI NA	607 53RD	P1	SP47250U	6004868737147250603
-	RUI Z	CAROLI NA	83 W MAI N ST A	P1	BS87984M	6004862002650945800
-	RUI Z	CAROLI NA	5 WESTM	P1	VU96568Z	6004868838296568702
-	RUI Z	CAROLI NE	83 W MAI N ST	P1	2802524597	9004862002646535400

ready for input

F7- ExpCD F8- Rd F2- ExpCS F6- Nx SF4- SEL SF6- Cd Info

Search Type: 05 Program Type: 01 Value: \_\_\_\_\_

L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
RUEDA	ALMA	22-42 CLINT	P1	RR29046N	6004868727229046003
RUEDA	ANA	3 PELERS BLVD	P1	CM26244Z	6004868236126244901
RUEDA	ARMANDO	12 E POST RD 1A	P1	CE16694V	6004868233216694301
RUEDA	ARTURO	42-30 HAMPT	P1	TE04648E	6004868813204648201
RUEDA	BERNARDI	225 WEST PARK A	P1	DB67946Q	6004868312267946701
RUEDA	CARMEN	317 ELDER	P1	RH66710C	6004868724266710203
ROSARIO	CARMEN	317 ELDER	P1	VR85264V	6004868837285264109
RUEDA	COLON	31-18 87TH	P1	VT28603F	6004868838128603206
TORRES	DAISY	3538 91ST	P1	TX36320E	6004868819236320404
RUEDA	DEBORA	1705 PURDY	P1	SY35762K	6004868739335762902
RUEDA	DELGADIN	2430 MORRI	P1	SN71654V	6004868736271654002
RUEDA	DELIA	39-29 58 ST	P1	TK81041Y	6004868815281041101
RUEDA	DELORES	65 SPRUCE ST	P1	AH38029G	6004868214238029601
RUEDA	DIANA	221 SHERM	P1	TW34042X	6004868819134042803

Ready for input

F7-ExpCD F8-Rd F2-ExpCS F6-Nx SF4-SEL SF6-Cd Info

Search Type: 05

Program Type: 01

Value: \_\_\_\_\_

L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
RUFER	ANNA	311 FRONT ST	P1	BB96579W	6004868222296579607
RUFES	CARMEN	2235 HOMER	P1	UF82246S	6004868823382246603
RUFF IV	WESLEY	9 ANN ST	P1	CY17097R	6004868239317097807
RUFF IV	WESLEY	9 ANN ST	P1	CY17097R	6004868239317097807
RUFF	CHARLES	374 MARCU	P1	TG22949C	6004868814122949408
RUFF JR	MALVI N	45 PRI NCESS AVE	P1	DY62785N	6004868319362785801
RUFF	ABI GAI L	1704 DW GHT AVE	P1	DR13054G	6004862001771645000
RUFF	ADELL	144 WEST	P1	YS11057M	6004868937311057913
RUFF	ALI CEA	808 SARAT	P1	ZR24274K	6004868127224274918
RUFF	AMY	347 SO RUTLAND	P1	CX16114K	6004868239216114802
RUFF	ANEI TA	3444 FISH	P1	RX97805M	6004868729297805401
RUFF	ANN	44 S MAI N ST A	P1	AX36177M	6004862001599193100
RUFF	ANNETTE	99 W LSO	P1	YZ91384P	6004868931291384025
RUFF	ANNETTE	99 W LSO	P1	YZ91384P	6004868931291384025

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ready for input

F7- ExpCD F8- Rd F2- ExpCS F6- Nx SF4- SEL SF6- Cd I n f o

Search Type: 05 Program Type: 01 Value: \_\_\_\_\_

L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
RUFFI N	CALVI N	514 E 119	P1	TT70352F	6004868818170352902
RUFFI N	CANDI CE	812 COSBY RD	P1	BB26038C	6004868222226038807
RUFFI N	CARMEN	218 UNI ON AVE	P1	AG97646F	6004862002750115700
RUFFI N	CAROL	PO BOX 551 *	P1	BD40775B	6004868223140775805
RUFFI N	CASANDRA	225 HERKI MER RD	P1	BK55020F	6004868225255020604
RUFFI N	CATHERI N	850 N PLYMOUTH	P1	AD41482B	6004868213141482006
RUFFI N	CECI L	710 E 78	P1	UV06068A	6004868828306068405
RUFFI N	CHARI SMA	108-29 UNI ON	P1	YE63320V	6004868933263320714
RUFFI N	CHARLES	156 DR SAMUEL M	P1	CJ56814V	6004862001734451900
RUFFI N	CHARLES	77 LARK ST	P1	AG93650J	6004868214193650003
RUFFI N	CHRI STI E	47 NORTH MALCOL	P1	DB96147V	6004868312296147701
RUFFI N	CHRI STI N	537 MARCY	P1	ZC08021R	6004868122308021939
RUFFI N	CHRI STI N	416 ELM STREET	P1	BS68342N	6004862001963422200
RUFFI N	CHRI STOP	29 SI DWAY ST	P1	BN44225R	6004868226244225007

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eady for input F7- ExpCD F8- Rd F2- ExpCS F6- Nx SF4- SEL SF6- Cd I nfo

Search Type: 05 Program Type: 01 Value: \_\_\_\_\_

L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
RUFINA	LYSOGORS	735 WEST	A1	ZV24671D	6004861128324671901
RUFINO JR	FRANCIS	60 CIRCLE RD	P1	AV20064J	6004868218320064202
RUFINO	AMARILIS	215-09 A HILLS	P1	SD15585J	6004868733115585401
RUFINO	ANN	29-14 139TH	P1	TB93868S	6004868812293868001
RUFINO	ANNABELL	107 VAN B	P1	ZZ66082X	6004868121266082719
RUFINO	ANNABELL	220 CRIPPEN AVE	P1	CW41056Z	6004868239141056102
RUFINO	ANNETTE	1995 7TH A	P1	YZ57140S	6004868931257140817
RUFINO	ARSENIO	1416 NELSON AVE	P1	VC38657Q	6004868832338657904
RUFINO	BRANDOWN	456 PARK	P1	TV00005B	6004868818300005206
RUFINO	CALIXTA	2405 1ST A	P1	WN40051U	6004868916240051205
RUFINO	CARMEN	168 SHERM	P1	VV95101Y	6004868838395101603
MORILLO	AURA	168 SHERM	A1	VV95101Y	6004861838395101501
RUFINO	CHRISTIN	346 WEST	P1	QV71021H	6004868118371021301
RUFINO	DANIELLE	60 CIRCLE RD	P1	BR34322Q	6004868227234322804

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ready for input F7-ExpCD F8-Rd F2-ExpCS F6-Nx SF4-SEL SF6-Cd Info

Search Type: 05 Program Type: 01 Value: \_\_\_\_\_

L	L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
	RUGGI ERO	CAM LLE	93-05 168TH	P1	TF62670R	6004868813362670310
	RUGGI ERO	CAM LLE	83 BLAKE	P1	TT93753X	6004868818193753615
	RUGGI ERO	CARMEN	85 MOHI CAN STRE	P1	AE56674T	6004868213256674801
	RUGGI ERO	CAROLI NA	180 MAPLE COURT	P1	CC85081W	6004868232385081001
	RUGGI ERO	CAROLYN	69-32 CALDW	P1	QY08298H	6004868119308298301
	RUGGI ERO	CHARLES	4 RALPH ROAD	P1	AR83589P	6004868217283589106
	RUGGI ERO	CHERYL	5308 CAUTERSKI L	P1	AQ52679A	6004868211152679304
	RUGGI ERO	CHRI STI N	PO BOX 51	P1	BW84938X	6004868229134938606
	RUGGI ERO	CHRI STI N	47 FIFTH ST	P1	CB26404A	6004868232226404305
	RUGGI ERO	CHRI STI N	35 NASSAU LANE	P1	DC00659R	6004868312300659501
	RUGGI ERO	CLEMENTE	401 SENECA MANO	P1	AK82213Y	6004868215282213603
	RUGGI ERO	CRYSTAL	12 NADEL COURT	P1	DA08697C	6004868312108697901
	RUGGI ERO	CYNTHI A	65 SLI CKER RD	P1	CS68373H	6004868237368373903
	RUGGI ERO	DANI EL	85 COURT STREET	P1	DZ80417K	6004868311280417401

ready for input

F7-ExpCD F8-Rd F2-ExpCS F6-Nx SF4-SEL SF6-Cd Info



Search Type: 05 Program Type: 01 Value: \_\_\_\_\_

L	L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
	RUBI ANO	MICHAEL	2420 BRONX PK E	P1	ZD28037J	6004868123128037915
	RUBI ANO	RUTH	851 44 ST	P1	UX88887X	6004868829288887002
	RUBI ANO	SALVATOR	94 W MONTAUK HW	P1	BA20599E	6004868222120599607
	RUBI	JOSE	1 CLARK	P1	TR51149D	6004868817251149005
	RUBI E	DAVE	109-40 201 S	P1	UH43834F	6004868824243834702
	RUBI E	MARLENA	121 MANHATTAN A	P1	BU16335E	6004862002214147000
	MORGAN	RUBI E	469 HANCO	P1	ZE19741E	6004868123219741516
	RUBI ERA	ADALI SA	2830 OLLI N	P1	YU28702N	6004868938228702815
	RUBI ERA	ANA	568 W 173	P1	ZP47458K	6004868127147458416
	RUBI ERA	ANDREW	603 MORRI	P1	WD57638K	6004868913157638504
	RUBI ERA	ASTRI	2 ELLWO	P1	UN57124P	6004868826257124805
	RUBI ERA	BRUNI LDA	603 MORRI	P1	WD57648F	6004868913157648404
	RUBI ERA	CARMEN	1408 ROSED	P1	ZU02249H	6004868128202249112
	RUBI ERA	CARMEN	1463 VYSE	P1	UZ09925R	6004868821209925805

ready for input

F7- ExpCD F8- Rd F2- ExpCS F6- Nx SF4- SEL SF6- Cd Info

Search Type: 05 Program Type: 01 Value: \_\_\_\_\_

L	L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
RUBI O	ANGELA	8882	WADSW	P1	ST00410B	6004868738100410903
RUBI O	ANI LDA	645	MELRO	P1	VG35805X	6004868834135805207
RUBI O	ANI TA	422	49TH	P1	RS45358H	6004868727345358902
RUBI O	ANTONI A	183	WYCKO	P1	VW76070M	6004868839176070504
RUBI O	ARI EL	516	WEST	P1	RT47883H	6004868728147883402
RUBI O	BALTAZAR	747	10TH AVE	P1	SX35449Z	6004868739235449402
RUBI O	BARBARA	153	BRABR	P1	YZ21056S	6004868931221056115
RUBI O	BETTY	340	W 49TH ST	P1	YY42735Z	6004868939342735103
RUBI O	CARI DAD	409	WEST	P1	VH12188U	6004868834212188105
RUBI O	CARLOS	31-67	37TH	P1	TX78102C	6004868819278102603
RUBI O	CARLOS	878	MONROE AVE	P1	DD95251Y	6004868313195251701
RUBI O	CARMEN	558	TYSEN	P1	WF93832G	6004868918193832102
RUBI O	CARMEN	3080	PARK	P1	ZV70131K	6004868128370131514
RUBI O	CARMEN	306	ST PAULS CT	P1	DQ80116Q	6004868311180116103

ready for input

F7- ExpCD F8- Rd F2- ExpCS F6- Nx SF4- SEL SF6- Cd I n f o

Search Type: 05 Program Type: 01 Value: \_\_\_\_\_

L	L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
RUBI NO	ADELAI DE	410B ROUND POND	P1	BA51102X	6004868222151102503	
RUBI NO	ADELI NE	812 MYRTLE AV	P1	BS36068F	6004868227336068305	
RUBI NO	ANN	354 MADI SON A	P1	DG24659Y	6004868314124659402	
RUBI NO	ANTHONY	220 OSGOO	P1	VW30948H	6004868919130948522	
RUBI NO	ANTOI NET	27 PARK CENTER	P1	DD89054Z	6004868313189054301	
RUBI NA	BELLA	18 FR CAPODANNO	P1	VP80663P	6004868837180663207	
RUBI NO	BERNARD	1160 RI CHM	P1	VN53821Q	6004868836253821403	
RUBI NO	CARL	35 PARK AVE	P1	DQ44757N	6004868311144757901	
RUBI NO	CARMEN	36 ADRI AN AVE	P1	CZ76701W	6004868231276701503	
RUBI NO	CAROL	486 ELK STREET	P1	BS36067H	6004868227336067505	
RUBI NO	CATHERI N	225 HYLAN BLVD	P1	ZD70434W	6004868123170434812	
LEONA	RUBI NO	225 HYLAN BLVD	A1	ZD70434W	6004861123170434702	
RUBI NO	CHRI S	170 MONTAUK HWY	P1	CE40945P	6004868233240945604	
RUBI NO	CHRI STI N	171 ARNOLD AVE	P1	BW09753W	6004868229199753601	

ready for input

F7- ExpCD F8- Rd F2- ExpCS F6- Nx SF4- SEL SF6- Cd I n f o

Search Type: 05 Program Type: 01 Value: \_\_\_\_\_

L NAME	F NAME	STREET	PT	SOURCE I D	CARD NUMBER
RUBI NOFF	HAROLD	906 EASTE	P1	ZU24844N	6004868128224844718
RUBI NOFF	MELI SSA	906 EASTE	P1	SM31584Z	6004868736131584308
RUBI NOFF	MELI SSA	906 EASTE	P1	SM31584Z	6004868736131584308
RUBI NOKOPP	JUDY	10130 CAMPBELL	P1	DR95146K	6004868317295146901
RUBI NOS TORR	HUMBERTO	6240 WOODHAVEN	P1	VJ70331V	6004868835170331504
RUBI NOS TORR	HUMBERTO	6240 WOODHAVEN	P1	VJ70331V	6004868835170331504
RUBI NOS	CAMI LO	617 WEST	P1	QX82505Y	6004868119282505101
RUBI NOS	CARMEN	617 WEST	P1	ZR23783G	6004868127223783612
RUBI NOS	LEONA	62-40 WOODHAVEN	P1	VN70728B	6004868916270728102
RUBI NOS	MARI A	3111 BROAD	P1	UC98468F	6004868822398468201
RUBI NOS	RI CARDO	1815 MORRI	P1	RR10518U	6004868727210518002
RUBI NOSRAFAEL	ROSA	9 LINDA LANE	P1	WP82863X	6004868917182863805
RUBI NOS	RUBEN	698 BEACH	P1	RV47826P	6004868728347826201
RUBI NOSRAFAEL	ROSA	9 LINDA LANE	P1	WP82863X	6004868917182863805

Ready for input

F7- ExpCD F8- Rd F2- ExpCS F6- Nx SF4- SEL SF6- Cd I n f o

To whom it may concern 11/11/07

I am writing this letter to you that MK Franklin Hugo at Ivana Grocery Store located at 1665 Topping Ave give me credit every month any time during the month for food like milk & everything else and if I have credit he also does it he is a very nice a person, giving me and I post him with my food stamp.

I thank you  
Mentor from  
1665 Topping Ave  
Brooklyn  
10457

NEW YORK STATE  
**BENEFIT** AF  
IDENTIFICATION CARD

ID NUMBER  
ZD94551W 600486 8123 1945 05

SEX / DOB  
F [REDACTED]



NAME: LAST  
HAIJOS

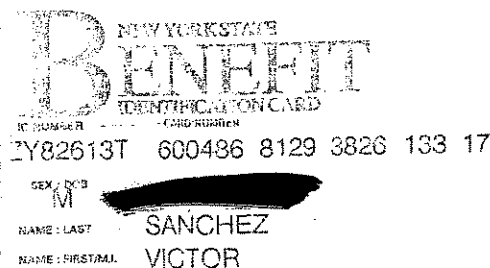
NAME: FIRST, MI.  
MADELINE

ISO# 600486

ACCESS NUMBER  
8123 1945 510 05

*Madeline H. H. H.*



ID# 600486

ACCESS NUMBER  
8129 3826 133SEQ#  
17

Yo: Victor Joubert e estado iendo a neste Bodega  
Por mas de 18 años A Ivana Grocery Store  
la cual se llama ahora Por Nuevos  
Duenos, Ellos median Credito y yo le pago  
Mensual mente Con la tarjeta de cupones  
Y tan como leche Jugo Pan Carne y Huevo  
Y muchas cosas mas de alimentos  
Gracias a El Victor Joubert

**DID NOT PARTICIPATE DURING THE REVIEW PERIOD**

Shalvie Anderson

To Whom it may Concern  
that Mr. Franklyn Lugo  
at Iwana Grocery store located  
at 1665 Toppings Ave. 173rd St.  
gives me credit things like  
(Baby milk Enfamil for my daughter)  
I pay him back with my  
food stamps at the end of the  
month. Mr. Franklyn Lugo has  
been a big help to me & my  
daughter.

Sincerely, Shalvie Anderson  
Thank you!

JAMES CARTER  
Notary Public, State of New York  
No. 01CA4987969  
Qualified in Bronx County  
Commission Expires Jan. 14, 2010

James Carter  
11/12/07



NEW YORK STATE  
SECRET  
ID CARD

IC NUMBER CA NUMBER  
RC34585R 600486 8722 3345 859 04


SEX DOB  
F [REDACTED]

LAST NAME FIRST NAME / MI  
ANDERSON SHALICIA

*Shalicia Andino*

50436  
ACCESS NUMBER  
8722 3345 859 04

50436



JAMES CARTER  
Notary Public, State of New York  
No. 01CA4987969  
Qualified in Bronx County  
Commission Expires Jan. 14, 20\_10

*James Carter*  
*11/12/07*

Untitled

Card #: 6004868722334585904

Svc Site: 66037

Card Sts: 01

Primary/Alternate Indicator: 01

Message: Y

First Name MI Last Name

SHALICIA ANDERSON

Address: 4 E 28 ST APT. 1017 NY, NY. 10016

SocSec# Tele#

Date of Birth

EDA: 936054261014 Sts: 01,1,0 Type: 01

EDA: 036054261027 Sts: 01,1,0 Type: 02

Last Transaction Information

Last Transaction Information

Debit: .60 11/19/07 22:36:15

Debit: 197.00 11/10/07 12:19:50

Credit: 170.00 11/10/07 00:06:02

Credit: 26.00 11/10/07 00:06:12

\* Active

\* Active

Available Balance: .05

Available Balance: .00

Sel: x

Sel:

Card #: 6004868722334585904

Account Sts: 01

EDA #: 936054261014

Card Sts: 01

Start Date: 060107

Available Balance .05

Transaction Information									
sel	Date	Time	Type	Trn Amt	Cmp Amt	Card Number	Loc/Reason	AFSC	
	09/20/07	19:50	1,0 *	3.00	.00	6004868722334585003	FELINO GRO	N51S	
	09/20/07	19:51	1,0 *	3.00	.00	6004868722334585003	FELINO GRO	N51S	
	09/29/07	9:16	1,0 *	4.50	.00	6004868722334585003	MEGA FOOD	N51S	
	10/11/07	:06	2,4	227.00	227.00	6004868722334585003	BENEFIT UPDAT	YNNS	
	10/12/07	17:13	1,0	1.25	1.25	6004868722334585904	2085 DELI-	YNNS	
	10/12/07	18:36	1,0 *	50.09	.00	6004868722334585904	PAURIANY #	N55S	
	10/12/07	18:37	1,0	50.09	50.09	6004868722334585904	PAURIANY #	YNNS	
	10/12/07	18:47	1,0	57.23	57.23	6004868722334585904	IVANA GROC	YNNS	
	10/12/07	19:15	1,0	17.12	17.12	6004868722334585904	TREMONT ME	YNNS	
	10/12/07	20:22	1,0	1.25	1.25	6004868722334585904	PALERO FOO	YNNS	

Did not participate during review month R. 97

# **CHARGE LETTER**

**Cora, Margarita**

**From:** TrackingUpdates@fedex.com  
**Sent:** Wednesday, November 07, 2007 10:33 AM  
**To:** Cora, Margarita  
**Subject:** FedEx Shipment 791427650150 Delivered

This tracking update has been requested by:

Company Name: USDA FNS  
Name: Gilda Torres  
E-mail: margarita.cora@fns.usda.gov

Our records indicate that the following shipment has been delivered:

Reference: 43-1358-4-020  
Ship (P/U) date: Nov 6, 2007  
Delivery date: Nov 7, 2007 10:02 AM  
Sign for by: X.XONANA G  
Delivered to: Receptionist/Front Desk  
Service type: FedEx Priority Overnight  
Packaging type: FedEx Envelope  
Number of pieces: 1  
Weight: 1.00 lb.  
Special handling/Services: Adult Signature Required  
Deliver Weekday

Tracking number: 791427650150

Shipper Information  
Gilda Torres  
USDA FNS  
201 VARICK ST RM 609  
NEW YORK  
NY  
US  
10014

Recipient Information  
Franklyn F. Lugo  
Ivana Grocery Store  
1665 TOPPING AVE  
BRONX  
NY  
US  
104577107

Please do not respond to this message. This email was sent from an unattended mailbox. This report was generated at approximately 9:33 AM CST on 11/07/2007.

To learn more about FedEx Express, please visit our website at [fedex.com](http://fedex.com).

All weights are estimated.

To track the latest status of your shipment, click on the tracking number above, or visit us at [fedex.com](http://fedex.com).

This tracking update has been sent to you by FedEx on the behalf of the Requestor noted above. FedEx does not validate the authenticity of the requestor and does not validate, guarantee or warrant the authenticity of the request, the requestor's message, or the accuracy of this tracking update. For tracking results and [fedex.com](http://fedex.com)'s terms of use, go to [fedex.com](http://fedex.com).

Thank you for your business.

A.R. 99

11/7/2007

From: Origin ID: UTOA (212)620-3691  
 Gilda Torres  
 USDA FNS  
 201 VARICK ST RM 609  
 NEW YORK, NY 10014



Ship Date: 06NOV07  
 ActWgt: 1 LB  
 System#: 1664936/INET7091  
 Account#: S \*\*\*\*\*

Delivery Address Bar Code

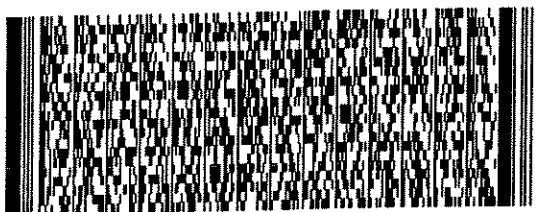


Ref # 43-1358-4-020  
 Invoice #  
 PO #  
 Dept #

SHIP TO: (718)466-4935 BILL SENDER

Franklyn F. Lugo  
 Ivana Grocery Store  
 1665 TOPPING AVE

BRONX, NY 104577107

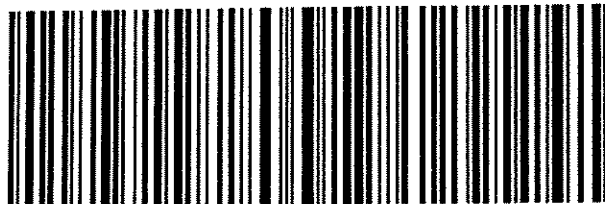


TRK# 7914 2765 0150  
 0201

WED - 07NOV A2  
 PRIORITY OVERNIGHT  
 ASR

ZM-HPNA

JFK  
 NY-US  
 10457



Shipping Label: Your shipment is complete

1. Use the 'Print' feature from your browser to send this page to your laser or inkjet printer.

2. Fold the printed page along the horizontal line.

3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.



Food and  
Nutrition  
Service

New York City Field Office  
201 Varick St  
RM 609  
New York City, NY 10014  
(212) 620-3691

Franklyn F Lugo, Owner  
Ivana Grocery Store  
1665 Topping Avenue  
Bronx, NY 10457

6 NOV 2007

The United States Department of Agriculture Food and Nutrition Service (FNS) has compiled evidence that your firm has violated the Food Stamp Program (FSP) regulations (enclosed). Analysis of the records reveal Electronic Benefit Transfer (EBT) food stamp transactions that establish clear and repetitive patterns of unusual, irregular, and inexplicable FSP activity for your type of firm. A partial listing of such transactions is enclosed.

Based on this information, we are charging you with the following trafficking violations (exchanging cash for FSP benefits). These violations occurred during the months of June, July and August 2007.

1. In a series of food stamp EBT transactions, multiple withdrawals were made from the accounts of one or more food stamp recipients within unusually short time frames. These transactions are listed in Attachment 1.
2. In a series of food stamp EBT transactions, multiple withdrawals were made from a single food stamp recipient's account within unusually short time frames. These transactions are listed in Attachment 2.
3. Your firm completed EBT transactions that depleted the majority or all of a recipient's monthly food stamp benefit in unusually short time frames. These transactions are listed in Attachment 3.
4. An excessive number of manual key entered transactions were made from your location. These transactions significantly exceeded the normal practice for stores in your state. These transactions are listed in Attachment 4.
5. In a series of food stamp EBT transactions, excessively large withdrawals were made from the accounts of the food stamp recipients listed in Attachment 5.

If it is determined that your firm committed the trafficking violations noted above, it will be permanently disqualified from the FSP as provided by section 278.6(e)(1). Civil or criminal action may also be taken against you by the United States Attorney.

In addition, a fiscal claim may be assessed to recover the monetary losses to the Federal Government resulting from trafficking violations.

The FSP regulations also provide that, under certain conditions, FNS may impose a CMP of up to \$54,000 in lieu of permanent disqualification of a firm for trafficking. The FSP regulations, section 278.6(i), list the criteria that you must meet in order to be considered for a CMP. If you request a CMP, you must meet each of the four criteria listed and provide the documentation as specified within 10 days of your receipt of this letter. If your request and the required documentation are not submitted on time, you will lose your right for any further consideration for a CMP.

If it is determined that you qualify for a CMP, the amount of that penalty will be \$54,000.00. Payment in full is due within 30 days after you receive our determination letter. The amount

of the CMP was calculated in accordance with FSP regulations at 278.6(j).

If you do not request consideration for a civil money penalty (CMP) or are determined to be ineligible for a CMP, FSP regulations section 278.6(c) provide that the permanent disqualification of your firm shall be effective on the date of receipt of the letter informing you of our final decision. If the permanent disqualification of your firm is later reversed through administrative or judicial review, USDA shall not be liable for the value of any sales lost during the period of disqualification you served.

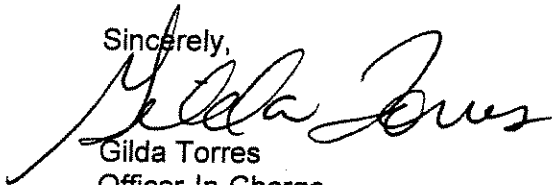
If you are an authorized vendor under the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), you may be disqualified from the WIC Program as a result of your disqualification from the FSP. In accordance with current law governing both the FSP and the WIC Program, such a WIC Program disqualification is not subject to administrative or judicial review under the WIC Program. A Civil Money Penalty from the Food Stamp Program may also result in a WIC Program disqualification, but such a disqualification would be subject to administrative and/or judicial review.

In the event that you sell or transfer ownership of your store after you are disqualified, you will be subject to and liable for a CMP as provided by FSP regulations sections 278.6(f)(2),(3) and (4). The amount of this sale or transfer CMP will be calculated based on FSP regulations 278.6(g).

We are providing you with an opportunity to explain the unusual and/or irregular EBT transactions noted in this letter and attachments. If you have information or evidence to prove that the transactions identified were not trafficking, it is important to reply orally or in writing to Gilda Torres. If you decide to schedule a meeting please call (212) 620-3691 for an appointment. You may have legal counsel present at that meeting. We will fully consider your reply and any documentation you provide before we make a final decision in this matter. However, if we do not hear from you within 10 days of receipt of this letter, you will be disqualified. If you schedule an interview and fail to keep the appointment, we will consider that action as a non-response to this letter.

Si usted tiene dificultad entendiendo esta carta debido a falta de conocimiento del idioma inglés, llame a nuestra oficina al número: (212) 620-3691 inmediatamente. Nosotros le explicaremos o traduciremos el contenido.

Sincerely,



Gilda Torres  
Officer-In-Charge  
Metro I  
New York Federal Nutrition Program  
Enclosures



**ATTACHMENT 1**

In a series of Food Stamp EBT transactions, multiple withdrawals were made from the account of one or more food stamp recipients within unusually short time frames.

<i>TERMINAL</i>	<i>DATE</i>	<i>TIME</i>	<i>HOUSEHOLD</i>	<i>AMOUNT</i>	<i>METHOD</i>
34534D	6/2/2007	1:00:13 PM	66002597530B01	\$30.05	key
34534D	6/2/2007	1:03:01 PM	119612680101	\$107.25	swipe
<i>Total Time:</i>		2 minutes	48 seconds	\$137.30	
34534D	6/4/2007	1:29:56 PM	66006985212H01	\$40.23	swipe
34534D	6/4/2007	1:34:30 PM	66001149961D01	\$99.98	swipe
34534D	6/4/2007	1:39:11 PM	66005890801D01	\$101.74	swipe
<i>Total Time:</i>		9 minutes	15 seconds	\$241.95	
34534D	6/5/2007	12:04:25 PM	66004198776J02	\$31.00	key
34534D	6/5/2007	12:09:15 PM	66004882802E01	\$105.63	key
<i>Total Time:</i>		4 minutes	50 seconds	\$136.63	
34534D	6/5/2007	4:02:26 PM	66006276021A01	\$30.05	swipe
34534D	6/5/2007	4:06:24 PM	66005325470C01	\$71.25	key
<i>Total Time:</i>		3 minutes	58 seconds	\$101.30	
34534D	6/6/2007	8:22:41 AM	66001384163A01	\$23.53	swipe
34534D	6/6/2007	8:27:09 AM	66009278163C01	\$94.98	key
<i>Total Time:</i>		4 minutes	28 seconds	\$118.51	
34534D	6/7/2007	8:32:03 AM	66002590624J01	\$84.99	swipe
34534D	6/7/2007	8:36:12 AM	66007805444C01	\$104.59	key
<i>Total Time:</i>		4 minutes	9 seconds	\$189.58	
34534D	6/7/2007	12:09:32 PM	66002460034I01	\$79.93	key
34534D	6/7/2007	12:14:15 PM	66000510791H01	\$72.66	swipe
<i>Total Time:</i>		4 minutes	43 seconds	\$152.59	
34534D	6/7/2007	2:25:01 PM	66001353344D01	\$50.15	key
34534D	6/7/2007	2:27:31 PM	66004544840E01	\$57.83	key
<i>Total Time:</i>		2 minutes	30 seconds	\$107.98	
34534D	6/7/2007	7:40:35 PM	66000312764E01	\$109.60	key
34534D	6/7/2007	7:43:36 PM	66002590624J01	\$99.47	swipe
<i>Total Time:</i>		3 minutes	1 seconds	\$209.07	
34534D	6/7/2007	8:14:02 PM	66000154717D01	\$55.22	swipe
34534D	6/7/2007	8:18:17 PM	66002284700I01	\$85.32	key
<i>Total Time:</i>		4 minutes	15 seconds	\$140.54	

0100468

10/22/2007

Page 1 of 5

ATTACHMENT 1

A.R. 103



<i>TERMINAL</i>	<i>DATE</i>	<i>TIME</i>	<i>HOUSEHOLD</i>	<i>AMOUNT</i>	<i>METHOD</i>
34534D	6/8/2007	8:02:54 AM	66002270795E01	\$69.75	swipe
34534D	6/8/2007	8:07:44 AM	66001066805B01	\$71.93	swipe
34534D	6/8/2007	8:11:17 AM	66002270795E01	\$41.24	swipe
34534D	6/8/2007	8:15:17 AM	66006796525B01	\$101.73	swipe
34534D	6/8/2007	8:19:09 AM	66009202016D01	\$14.03	swipe
34534D	6/8/2007	8:23:12 AM	66000468465A01	\$59.82	key
<i>Total Time:</i>		20 minutes	18 seconds	\$358.50	
34534D	6/9/2007	12:40:29 PM	66006727612B01	\$100.24	swipe
34534D	6/9/2007	12:44:53 PM	66002530759G01	\$61.32	key
34534D	6/9/2007	12:47:54 PM	66000468465A01	\$25.41	key
<i>Total Time:</i>		7 minutes	25 seconds	\$186.97	
34534D	6/9/2007	7:24:59 PM	66000899864D01	\$56.70	swipe
34534D	6/9/2007	7:28:22 PM	66004374007F01	\$49.88	swipe
34534D	6/9/2007	7:30:28 PM	66001084866B01	\$48.74	key
34534D	6/9/2007	7:33:48 PM	66000524366C01	\$30.12	key
<i>Total Time:</i>		8 minutes	49 seconds	\$185.44	
34534D	6/11/2007	2:48:29 PM	66003860365A01	\$50.33	swipe
34534D	6/11/2007	2:51:56 PM	66006878724B01	\$51.22	swipe
<i>Total Time:</i>		3 minutes	27 seconds	\$101.55	
34534D	6/11/2007	4:17:30 PM	66006634476D01	\$17.00	swipe
34534D	6/11/2007	4:21:23 PM	66002527243G01	\$17.60	key
34534D	6/11/2007	4:24:31 PM	66005801127B01	\$100.05	swipe
<i>Total Time:</i>		7 minutes	1 seconds	\$134.65	
34534D	6/13/2007	10:37:36 AM	66000008487B01	\$100.89	key
34534D	6/13/2007	10:41:57 AM	66005192724C01	\$30.35	key
<i>Total Time:</i>		4 minutes	21 seconds	\$131.24	
34534D	6/14/2007	12:58:47 PM	66005934997H01	\$48.21	key
34534D	6/14/2007	1:00:55 PM	66005215699J01	\$25.32	key
34534D	6/14/2007	1:04:14 PM	66008507358D01	\$77.13	swipe
<i>Total Time:</i>		5 minutes	27 seconds	\$150.66	
34534D	7/2/2007	3:02:13 PM	66004126020J01	\$51.02	swipe
34534D	7/2/2007	3:05:39 PM	66006497840G01	\$101.73	key
<i>Total Time:</i>		3 minutes	26 seconds	\$152.75	
34534D	7/3/2007	10:06:39 AM	66000432060C01	\$92.25	key
34534D	7/3/2007	10:08:53 AM	66004211821G01	\$88.39	key
<i>Total Time:</i>		2 minutes	14 seconds	\$180.64	
34534D	7/3/2007	11:25:27 AM	66001310448E01	\$98.25	key
34534D	7/3/2007	11:29:26 AM	66001602760J01	\$51.47	swipe
<i>Total Time:</i>		3 minutes	59 seconds	\$149.72	

0100468

10/22/2007

Page 2 of 5

ATTACHMENT 1

A.R. 104

TERMINAL	DATE	TIME	HOUSEHOLD	AMOUNT	METHOD
34534D	7/5/2007	8:11:13 AM	66007895992B01		
34534D	7/5/2007	8:15:51 AM	66003297522J01	\$51.27	key
34534D	7/5/2007	8:18:44 AM	66005657872H01	\$92.14	key
Total Time:		7 minutes	31 seconds	\$91.12	key
				\$234.53	
34534D	7/5/2007	3:38:33 PM	66004590848A01	\$64.83	key
34534D	7/5/2007	3:43:20 PM	66001806082C01	\$49.63	swipe
Total Time:		4 minutes	47 seconds	\$114.46	
34534D	7/6/2007	11:37:29 AM	66000273069F01	\$78.15	key
34534D	7/6/2007	11:40:16 AM	66007577873I01	\$59.47	swipe
Total Time:		2 minutes	47 seconds	\$137.62	
34534D	7/6/2007	2:19:31 PM	66010454212B01	\$58.17	key
34534D	7/6/2007	2:22:22 PM	66004144992H01	\$100.85	key
Total Time:		2 minutes	51 seconds	\$159.02	
34534D	7/6/2007	3:43:09 PM	66001806082C01	\$47.18	swipe
34534D	7/6/2007	3:46:57 PM	66007230903C01	\$73.77	swipe
Total Time:		3 minutes	48 seconds	\$120.95	
34534D	7/7/2007	12:03:41 PM	66010613894E01	\$82.12	swipe
34534D	7/7/2007	12:06:09 PM	66007232526J01	\$31.08	key
Total Time:		2 minutes	28 seconds	\$113.20	
34534D	7/7/2007	12:14:48 PM	66000312764E01	\$100.13	key
34534D	7/7/2007	12:17:30 PM	66007648803A01	\$51.45	key
Total Time:		2 minutes	42 seconds	\$151.58	
34534D	7/7/2007	2:01:57 PM	66007230903C01	\$48.29	swipe
34534D	7/7/2007	2:05:26 PM	66004000001A01	\$63.50	swipe
Total Time:		3 minutes	29 seconds	\$111.79	
34534D	7/7/2007	3:15:50 PM	66003416574G01	\$99.58	key
34534D	7/7/2007	3:19:58 PM	66002623283F01	\$54.33	key
Total Time:		4 minutes	8 seconds	\$153.91	
34534D	7/7/2007	4:22:07 PM	66007577873I01	\$19.98	key
34534D	7/7/2007	4:24:33 PM	66004596494H01	\$49.86	key
34534D	7/7/2007	4:27:26 PM	66001806082C01	\$42.64	swipe
Total Time:		5 minutes	19 seconds	\$112.48	
34534D	7/7/2007	7:57:23 PM	66003623372E01	\$99.50	key
34534D	7/7/2007	8:01:20 PM	66000727705G01	\$19.98	swipe
Total Time:		3 minutes	57 seconds	\$119.48	
34534D	7/9/2007	10:33:21 AM	66007217700J01	\$94.13	swipe
34534D	7/9/2007	10:38:16 AM	66000930225I01	\$49.93	key
Total Time:		4 minutes	55 seconds	\$144.06	

0100468

10/22/2007

Page 3 of 5

ATTACHMENT 1

A.R. 105

TERMINAL	DATE	TIME	HOUSEHOLD	AMOUNT	METHOD
34534D	7/9/2007	6:20:37 PM	66001129505C01		
34534D	7/9/2007	6:24:41 PM	66006584485E01	\$77.90	swipe
Total Time:		4 minutes	4 seconds	\$44.88	key
				\$122.78	
34534D	7/9/2007	8:48:42 PM	66000727705G01	\$26.60	swipe
34534D	7/9/2007	8:51:21 PM	66001129505C01	\$48.17	swipe
34534D	7/9/2007	8:54:49 PM	66004089880B01	\$27.03	key
Total Time:		6 minutes	7 seconds	\$101.80	
34534D	7/10/2007	10:42:59 AM	66000633806F01	\$81.20	key
34534D	7/10/2007	10:47:52 AM	66004662306C01	\$73.55	swipe
Total Time:		4 minutes	53 seconds	\$154.75	
34534D	7/11/2007	4:49:58 PM	66004539290J01	\$94.15	swipe
34534D	7/11/2007	4:53:03 PM	66005744832G01	\$28.74	key
34534D	7/11/2007	4:57:01 PM	66000008487B01	\$95.03	key
Total Time:		7 minutes	3 seconds	\$217.92	
34534D	7/13/2007	8:57:51 AM	66009484878F01	\$74.83	key
34534D	7/13/2007	9:02:45 AM	66000521006H01	\$30.75	key
34534D	7/13/2007	9:05:12 AM	66005215699J01	\$103.74	swipe
Total Time:		7 minutes	21 seconds	\$209.32	
34534D	7/13/2007	9:40:24 AM	66004300629F01	\$89.63	key
34534D	7/13/2007	9:44:57 AM	66001115533A01	\$12.44	key
34534D	7/13/2007	9:49:40 AM	66004325901J01	\$51.27	swipe
34534D	7/13/2007	9:53:32 AM	66004354933G01	\$49.88	key
Total Time:		13 minutes	8 seconds	\$203.22	
34534D	7/17/2007	1:00:35 PM	66008507358D01	\$74.25	swipe
34534D	7/17/2007	1:05:34 PM	66004707017C01	\$12.74	swipe
34534D	7/17/2007	1:08:19 PM	66001963432I01	\$103.88	key
Total Time:		7 minutes	44 seconds	\$190.87	
34534D	8/2/2007	4:19:14 PM	66006497840G01	\$81.25	key
34534D	8/2/2007	4:21:28 PM	66003209981E01	\$20.51	swipe
Total Time:		2 minutes	14 seconds	\$101.76	
34534D	8/3/2007	6:40:40 PM	47F00A37211	\$70.71	swipe
34534D	8/3/2007	6:43:40 PM	66005744051D01	\$36.58	key
Total Time:		3 minutes	0 seconds	\$107.29	
34534D	8/4/2007	12:16:06 PM	66002527243G01	\$42.50	key
34534D	8/4/2007	12:19:32 PM	66002527243G01	\$75.00	key
Total Time:		3 minutes	26 seconds	\$117.50	
34534D	8/4/2007	5:40:26 PM	710026174	\$101.03	swipe
34534D	8/4/2007	5:44:51 PM	66007251232A01	\$60.09	swipe
Total Time:		4 minutes	25 seconds	\$161.12	

0100468

10/22/2007

Page 4 of 5

ATTACHMENT 1

A.R. 106

TERMINAL	DATE	TIME	HOUSEHOLD	AMOUNT	METHOD
34534D	8/6/2007	2:15:15 PM	66000474363J01	\$44.45	key
34534D	8/6/2007	2:17:28 PM	66010145738A01	\$59.98	key
Total Time:		2 minutes	13 seconds	\$104.43	
34534D	8/7/2007	9:01:11 AM	66004596494H01	\$56.28	key
34534D	8/7/2007	9:03:41 AM	66004101004C01	\$52.00	key
Total Time:		2 minutes	30 seconds	\$108.28	
34534D	8/8/2007	3:48:34 PM	66004595760C01	\$28.03	key
34534D	8/8/2007	3:51:32 PM	66001129505C01	\$88.49	swipe
Total Time:		2 minutes	58 seconds	\$116.52	
34534D	8/8/2007	5:26:31 PM	66000154717D01	\$92.07	key
34534D	8/8/2007	5:31:01 PM	66000751833F01	\$95.43	swipe
Total Time:		4 minutes	30 seconds	\$187.50	
34534D	8/9/2007	3:27:48 PM	66000662744C01	\$51.24	key
34534D	8/9/2007	3:31:17 PM	66004374007F01	\$49.72	swipe
34534D	8/9/2007	3:35:17 PM	66006878724B01	\$48.97	swipe
Total Time:		7 minutes	29 seconds	\$149.93	
34534D	8/10/2007	1:47:02 PM	66006697769F01	\$20.02	key
34534D	8/10/2007	1:50:01 PM	66009202016D01	\$100.85	swipe
Total Time:		2 minutes	59 seconds	\$120.87	
34534D	8/10/2007	3:59:20 PM	66005647777B01	\$79.84	key
34534D	8/10/2007	4:03:38 PM	66009396665D01	\$31.22	key
34534D	8/10/2007	4:06:55 PM	66003752064A01	\$95.63	swipe
Total Time:		7 minutes	35 seconds	\$206.69	
34534D	8/13/2007	8:34:03 PM	66002381728B01	\$107.85	swipe
34534D	8/13/2007	8:36:35 PM	66000740007A01	\$11.50	key
Total Time:		2 minutes	32 seconds	\$119.35	
34534D	8/14/2007	10:38:17 AM	66006683789J01	\$101.50	key
34534D	8/14/2007	10:43:10 AM	66008166085E01	\$99.83	swipe
Total Time:		4 minutes	53 seconds	\$201.33	
34534D	8/14/2007	12:03:07 PM	66007215489B01	\$70.06	key
34534D	8/14/2007	12:07:30 PM	66000471728G01	\$79.88	key
Total Time:		4 minutes	23 seconds	\$149.94	
34534D	8/19/2007	4:12:49 PM	66008157053D01	\$66.98	swipe
34534D	8/19/2007	4:17:44 PM	66004323949A01	\$39.97	key
Total Time:		4 minutes	55 seconds	\$106.95	

Total transactions:

128

\$8,200.77

0100468

10/22/2007

Page 5 of 5

ATTACHMENT 1

A.R. 107

**ATTACHMENT 2**

In a series of Food Stamp EBT transactions, multiple withdrawals were made from the account of a single food stamp household within unusually short time frames.

TERMINAL	DATE	TIME	HOUSEHOLD	AMOUNT	METHOD
34534D	8/4/2007	12:16:06 PM	66002527243G01	\$42.50	key
34534D	8/4/2007	12:19:32 PM	66002527243G01	\$75.00	key
Total transactions: 2		Total Time: 0 hours 3 minutes 26 seconds	Total Amount: \$117.50		
34534D	6/8/2007	8:02:54 AM	66002270795E01	\$69.75	swipe
34534D	6/8/2007	8:11:17 AM	66002270795E01	\$41.24	swipe
Total transactions: 2		Total Time: 0 hours 8 minutes 23 seconds	Total Amount: \$110.99		
34534D	6/4/2007	2:37:17 PM	66000944001H01	\$100.12	key
34534D	6/4/2007	4:52:12 PM	66000944001H01	\$55.03	key
Total transactions: 2		Total Time: 2 hours 14 minutes 55 seconds	Total Amount: \$155.15		
34534D	7/9/2007	6:20:37 PM	66001129505C01	\$77.90	swipe
34534D	7/9/2007	8:51:21 PM	66001129505C01	\$48.17	swipe
Total transactions: 2		Total Time: 2 hours 30 minutes 44 seconds	Total Amount: \$126.07		
34534D	6/9/2007	6:00:52 PM	66009202016D01	\$50.70	swipe
34534D	6/9/2007	8:34:30 PM	66009202016D01	\$49.83	swipe
Total transactions: 2		Total Time: 2 hours 33 minutes 38 seconds	Total Amount: \$100.53		
34534D	7/12/2007	2:37:28 PM	66002688548D01	\$102.78	key
34534D	7/12/2007	5:25:33 PM	66002688548D01	\$36.75	key
Total transactions: 2		Total Time: 2 hours 48 minutes 5 seconds	Total Amount: \$139.53		
34534D	6/7/2007	11:06:45 AM	66001353344D01	\$101.33	key
34534D	6/7/2007	2:25:01 PM	66001353344D01	\$50.15	key
Total transactions: 2		Total Time: 3 hours 18 minutes 16 seconds	Total Amount: \$151.48		
34534D	6/4/2007	10:58:15 AM	FS000001485304	\$101.70	swipe
34534D	6/4/2007	2:20:14 PM	FS000001485304	\$49.98	swipe
Total transactions: 2		Total Time: 3 hours 21 minutes 59 seconds	Total Amount: \$151.68		
34534D	6/12/2007	2:54:30 PM	66004244438A01	\$40.31	key
34534D	6/12/2007	6:25:55 PM	66004244438A01	\$117.88	swipe
Total transactions: 2		Total Time: 3 hours 31 minutes 25 seconds	Total Amount: \$158.19		
34534D	8/10/2007	3:53:52 PM	66003921297C01	\$91.05	key
34534D	8/10/2007	7:41:48 PM	66003921297C01	\$35.38	key
Total transactions: 2		Total Time: 3 hours 47 minutes 56 seconds	Total Amount: \$126.43		



TERMINAL	DATE	TIME	HOUSEHOLD	AMOUNT	METHOD
34534D	6/13/2007	9:23:34 AM	66000787366E01	\$111.23	key
34534D	6/13/2007	1:12:18 PM	66000787366E01	\$43.50	swipe
Total transactions: 2		Total Time: 3 hours 48 minutes 44 seconds	Total Amount: \$154.73		
34534D	7/12/2007	1:42:11 PM	66002484953B01	\$104.76	key
34534D	7/12/2007	6:05:06 PM	66002484953B01	\$72.36	key
Total transactions: 2		Total Time: 4 hours 22 minutes 55 seconds	Total Amount: \$177.12		
34534D	6/7/2007	2:48:34 PM	66000563734D01	\$86.52	key
34534D	6/7/2007	7:53:02 PM	66000563734D01	\$30.88	key
Total transactions: 2		Total Time: 5 hours 4 minutes 28 seconds	Total Amount: \$117.40		
34534D	6/12/2007	10:30:31 AM	66000008487B01	\$100.79	key
34534D	6/12/2007	3:45:38 PM	66000008487B01	\$87.69	key
Total transactions: 2		Total Time: 5 hours 15 minutes 7 seconds	Total Amount: \$188.48		
34534D	6/13/2007	10:37:36 AM	66000008487B01	\$100.89	key
34534D	6/13/2007	4:12:15 PM	66000008487B01	\$97.32	key
Total transactions: 2		Total Time: 5 hours 34 minutes 39 seconds	Total Amount: \$198.21		
34534D	8/9/2007	9:00:32 AM	66002153842G01	\$101.12	key
34534D	8/9/2007	2:53:52 PM	66002153842G01	\$39.96	key
Total transactions: 2		Total Time: 5 hours 53 minutes 20 seconds	Total Amount: \$141.08		
34534D	7/11/2007	11:03:30 AM	66000008487B01	\$81.51	key
34534D	7/11/2007	4:57:01 PM	66000008487B01	\$95.03	key
Total transactions: 2		Total Time: 5 hours 53 minutes 31 seconds	Total Amount: \$176.54		
34534D	6/5/2007	9:17:10 AM	66006276021A01	\$101.09	swipe
34534D	6/5/2007	4:02:26 PM	66006276021A01	\$30.05	swipe
Total transactions: 2		Total Time: 6 hours 45 minutes 16 seconds	Total Amount: \$131.14		
34534D	8/13/2007	9:19:43 AM	66004052838C01	\$58.69	key
34534D	8/13/2007	4:13:22 PM	66004052838C01	\$44.83	key
Total transactions: 2		Total Time: 6 hours 53 minutes 39 seconds	Total Amount: \$103.52		
34534D	6/5/2007	9:27:34 AM	66007895992B01	\$109.36	swipe
34534D	6/5/2007	5:04:23 PM	66007895992B01	\$31.69	swipe
Total transactions: 2		Total Time: 7 hours 36 minutes 49 seconds	Total Amount: \$141.05		
34534D	6/2/2007	1:03:01 PM	119612680101	\$107.25	swipe
34534D	6/2/2007	9:27:36 PM	119612680101	\$98.65	swipe
Total transactions: 2		Total Time: 8 hours 24 minutes 35 seconds	Total Amount: \$205.90		
34534D	8/1/2007	8:35:31 AM	66005926038A01	\$60.35	key
34534D	8/1/2007	5:50:05 PM	66005926038A01	\$99.83	key
Total transactions: 2		Total Time: 9 hours 14 minutes 34 seconds	Total Amount: \$160.18		

0100468

10/22/2007

Page 2 of 3

ATTACHMENT 2

A.R. 109

TERMINAL	DATE	TIME	HOUSEHOLD	AMOUNT	METHOD
34534D	6/1/2007	1:30:30 PM	66004089880B01	\$71.25	key
34534D	6/1/2007	10:49:09 PM	66004089880B01	\$60.27	key
Total transactions: 2		Total Time: 9 hours 18 minutes 39 seconds	Total Amount: \$131.52		
34534D	6/8/2007	8:07:44 AM	66001066805B01	\$71.93	swipe
34534D	6/8/2007	5:35:20 PM	66001066805B01	\$44.08	swipe
Total transactions: 2		Total Time: 9 hours 27 minutes 36 seconds	Total Amount: \$116.01		
34534D	8/7/2007	2:14:50 PM	66001084866B01	\$72.06	key
34534D	8/7/2007	11:56:33 PM	66001084866B01	\$39.00	key
Total transactions: 2		Total Time: 9 hours 41 minutes 43 seconds	Total Amount: \$111.06		
34534D	7/14/2007	12:38:25 PM	66005926038A01	\$51.24	key
34534D	7/14/2007	10:24:25 PM	66005926038A01	\$49.93	swipe
Total transactions: 2		Total Time: 9 hours 46 minutes 0 seconds	Total Amount: \$101.17		
34534D	6/13/2007	8:21:41 AM	66004052838C01	\$51.23	key
34534D	6/13/2007	6:25:15 PM	66004052838C01	\$51.17	swipe
Total transactions: 2		Total Time: 10 hours 3 minutes 34 seconds	Total Amount: \$102.40		
34534D	7/3/2007	9:00:50 AM	66004462423H01	\$52.36	key
34534D	7/3/2007	7:24:37 PM	66004462423H01	\$51.03	key
Total transactions: 2		Total Time: 10 hours 23 minutes 47 seconds	Total Amount: \$103.39		
34534D	8/4/2007	11:52:37 AM	66004882802E01	\$69.45	swipe
34534D	8/4/2007	10:31:01 PM	66004882802E01	\$50.09	swipe
Total transactions: 2		Total Time: 10 hours 38 minutes 24 seconds	Total Amount: \$119.54		
34534D	6/7/2007	8:32:03 AM	66002590624J01	\$84.99	swipe
34534D	6/7/2007	7:43:36 PM	66002590624J01	\$99.47	swipe
Total transactions: 2		Total Time: 11 hours 11 minutes 33 seconds	Total Amount: \$184.46		
34534D	8/3/2007	8:28:51 AM	66007484852E01	\$78.34	key
34534D	8/3/2007	9:16:05 PM	66007484852E01	\$40.51	key
Total transactions: 2		Total Time: 12 hours 47 minutes 14 seconds	Total Amount: \$118.85		
Total transactions:		62	\$4,321.30		

**ATTACHMENT 3**

In a series of Food Stamp EBT transactions, the majority or all of the recipient's monthly food stamp benefits were depleted in an unusually short time frame.

TERMINAL	DATE	TIME	HOUSEHOLD	AMOUNT	METHOD	BALANCE
34534D	8/8/2007	5:26:31 PM	66000154717D01	\$92.07	key	\$0.43
Total:	1	Total Time: 0 hours 0 minutes 0 seconds		Total Amount:		\$92.07
34534D	6/9/2007	4:40:13 PM	66000471116E01	\$101.85	key	\$10.82
Total:	1	Total Time: 0 hours 0 minutes 0 seconds		Total Amount:		\$101.85
34534D	8/8/2007	5:31:01 PM	66000751833F01	\$95.43	swipe	\$0.14
Total:	1	Total Time: 0 hours 0 minutes 0 seconds		Total Amount:		\$95.43
34534D	7/3/2007	12:19:22 PM	66000955521A01	\$100.95	key	\$10.54
Total:	1	Total Time: 0 hours 0 minutes 0 seconds		Total Amount:		\$100.95
34534D	6/12/2007	5:40:31 PM	66002284700I01	\$99.88	key	\$8.26
Total:	1	Total Time: 0 hours 0 minutes 0 seconds		Total Amount:		\$99.88
34534D	7/16/2007	4:42:19 PM	66002621783G01	\$85.98	key	\$6.61
Total:	1	Total Time: 0 hours 0 minutes 0 seconds		Total Amount:		\$85.98
34534D	6/1/2007	9:47:37 AM	66003296082F01	\$99.88	key	\$2.49
Total:	1	Total Time: 0 hours 0 minutes 0 seconds		Total Amount:		\$99.88
34534D	8/10/2007	4:06:55 PM	66003752064A01	\$95.63	swipe	\$0.85
Total:	1	Total Time: 0 hours 0 minutes 0 seconds		Total Amount:		\$95.63
34534D	6/8/2007	4:09:53 PM	66003853120I01	\$99.60	key	\$4.33
Total:	1	Total Time: 0 hours 0 minutes 0 seconds		Total Amount:		\$99.60
34534D	7/10/2007	9:21:46 AM	66004403251E01	\$101.22	key	\$2.92
Total:	1	Total Time: 0 hours 0 minutes 0 seconds		Total Amount:		\$101.22
34534D	7/11/2007	4:49:58 PM	66004539290J01	\$94.15	swipe	\$0.01
Total:	1	Total Time: 0 hours 0 minutes 0 seconds		Total Amount:		\$94.15
34534D	8/10/2007	3:47:43 PM	66005630804C01	\$91.22	key	\$4.79
Total:	1	Total Time: 0 hours 0 minutes 0 seconds		Total Amount:		\$91.22
34534D	8/9/2007	10:51:02 AM	66005890801D01	\$90.83	swipe	\$0.86
Total:	1	Total Time: 0 hours 0 minutes 0 seconds		Total Amount:		\$90.83
34534D	7/8/2007	1:17:56 PM	66006727612B01	\$90.14	swipe	\$4.20
Total:	1	Total Time: 0 hours 0 minutes 0 seconds		Total Amount:		\$90.14
34534D	6/5/2007	12:27:32 PM	66006893231I01	\$92.50	swipe	\$0.02
Total:	1	Total Time: 0 hours 0 minutes 0 seconds		Total Amount:		\$92.50
34534D	7/12/2007	2:53:26 PM	66006968665H01	\$99.83	key	\$4.00
Total:	1	Total Time: 0 hours 0 minutes 0 seconds		Total Amount:		\$99.83



TERMINAL	DATE	TIME	HOUSEHOLD	AMOUNT	METHOD	BALANCE
34534D	8/9/2007	5:11:51 PM	66007232526J01			
Total:	1	Total Time:	0 hours 0 minutes 0 seconds	\$84.32	key	\$9.24
34534D	8/17/2007	4:31:46 PM	66008092290J01			\$84.32
Total:	1	Total Time:	0 hours 0 minutes 0 seconds	\$102.98	swipe	\$0.06
34534D	8/12/2007	5:53:41 PM	66009844385G01			\$102.98
Total:	1	Total Time:	0 hours 0 minutes 0 seconds	\$101.83	swipe	\$6.64
34534D	6/8/2007	8:02:54 AM	66002270795E01			\$101.83
34534D	6/8/2007	8:11:17 AM	66002270795E01	\$69.75	swipe	\$41.25
Total:	2	Total Time:	0 hours 8 minutes 23 seconds	\$41.24	swipe	\$0.01
34534D	6/4/2007	2:37:17 PM	66000944001H01			\$110.99
34534D	6/4/2007	4:52:12 PM	66000944001H01	\$100.12	key	\$55.17
Total:	2	Total Time:	2 hours 14 minutes 55 seconds	\$55.03	key	\$0.14
34534D	6/8/2007	1:55:08 PM	66005832080F01			\$155.15
34534D	6/8/2007	4:53:42 PM	66005832080F01	\$10.25	swipe	\$117.80
Total:	2	Total Time:	2 hours 58 minutes 34 seconds	\$105.19	swipe	\$12.61
34534D	6/7/2007	11:06:45 AM	66001353344D01			\$115.44
34534D	6/7/2007	2:25:01 PM	66001353344D01	\$101.33	key	\$54.17
Total:	2	Total Time:	3 hours 18 minutes 16 seconds	\$50.15	key	\$4.02
34534D	6/4/2007	10:58:15 AM	FS000001485304			\$151.48
34534D	6/4/2007	2:20:14 PM	FS000001485304	\$101.70	swipe	\$53.32
Total:	2	Total Time:	3 hours 21 minutes 59 seconds	\$49.98	swipe	\$3.34
34534D	6/12/2007	2:54:30 PM	66004244438A01			\$151.68
34534D	6/12/2007	6:25:55 PM	66004244438A01	\$40.31	key	\$118.12
Total:	2	Total Time:	3 hours 31 minutes 25 seconds	\$117.88	swipe	\$0.24
34534D	6/9/2007	3:45:02 PM	66004374007F01			\$158.19
34534D	6/9/2007	5:40:50 PM	66004374007F01	\$47.68	key	\$92.89
34534D	6/9/2007	5:42:09 PM	66004374007F01	\$28.03	key	\$64.86
34534D	6/9/2007	7:28:22 PM	66004374007F01	\$13.56	swipe	\$51.30
Total:	4	Total Time:	3 hours 43 minutes 20 seconds	\$49.88	swipe	\$1.42
34534D	6/13/2007	9:23:34 AM	66000787366E01			\$139.15
34534D	6/13/2007	1:12:18 PM	66000787366E01	\$111.23	key	\$43.87
Total:	2	Total Time:	3 hours 48 minutes 44 seconds	\$43.50	swipe	\$0.37
34534D	8/9/2007	9:00:32 AM	66002153842G01			\$154.73
34534D	8/9/2007	2:53:52 PM	66002153842G01	\$101.12	key	\$55.28
Total:	2	Total Time:	5 hours 53 minutes 20 seconds	\$39.96	key	\$15.32
34534D	8/13/2007	9:19:43 AM	66004052838C01			\$141.08
34534D	8/13/2007	4:13:22 PM	66004052838C01	\$58.69	key	\$45.32
Total:	2	Total Time:	6 hours 53 minutes 39 seconds	\$44.83	key	\$0.49
4534D	6/5/2007	9:27:34 AM	66007895992B01			\$103.52
4534D	6/5/2007	5:04:23 PM	66007895992B01	\$109.36	swipe	\$45.70
Total:	2	Total Time:	7 hours 36 minutes 49 seconds	\$31.69	swipe	\$8.72
						\$141.05

100468

10/22/2007

TTACHMENT 3

Page 2 of 3

A.R. 112

TERMINAL	DATE	TIME	HOUSEHOLD	AMOUNT	METHOD	BALANCE
34534D	6/13/2007	8:21:41 AM	66004052838C01	\$51.23	key	\$52.77
34534D	6/13/2007	6:25:15 PM	66004052838C01	\$51.17	swipe	\$1.60
<b>Total:</b>		<b>2</b>	<b>Total Time:</b> 10 hours 3 minutes 34 seconds	<b>Total Amount:</b>		<b>\$102.40</b>
34534D	7/14/2007	8:15:49 AM	66008558779I01	\$75.42	key	\$28.70
34534D	7/14/2007	7:03:12 PM	66008558779I01	\$27.99	swipe	\$0.71
<b>Total:</b>		<b>2</b>	<b>Total Time:</b> 10 hours 47 minutes 23 seconds	<b>Total Amount:</b>		<b>\$103.41</b>

**Total Transactions:**

47

\$3,548.56

**ATTACHMENT 4**

An excessive number of high dollar key-entered Food Stamp EBT transactions were made from your location. These transactions did not result from equipment problems and indicate that transactions were made without the card being present.

1525 of 2305 transactions over a three month period, or 66.16 percent were key entered.

DATE	TIME	HOUSEHOLD	AMOUNT
6/5/2007	10:28:22 AM	66001806082C01	\$127.75
6/4/2007	2:08:35 PM	66000922020D01	\$112.78
6/13/2007	9:23:34 AM	66000787366E01	\$111.23
6/1/2007	9:17:23 AM	66000972763H01	\$110.50
6/13/2007	10:03:09 PM	66008177628I01	\$109.77
6/7/2007	7:40:35 PM	66000312764E01	\$109.60
6/6/2007	9:07:33 PM	66000531751G01	\$109.18
6/11/2007	8:32:49 AM	66004668777I01	\$109.09
7/13/2007	9:58:42 AM	66005666488B01	\$108.53
6/8/2007	3:10:45 PM	66002144576C01	\$108.21
6/5/2007	7:03:14 PM	66003159342J01	\$108.10
8/17/2007	12:33:32 PM	66003955787B01	\$107.88
6/6/2007	12:26:32 PM	66000273069F01	\$107.85
8/14/2007	2:05:20 PM	66005410679E01	\$107.85
8/10/2007	11:06:18 AM	66004668777I01	\$107.55
6/5/2007	12:09:15 PM	66004882802E01	\$105.63
7/12/2007	1:42:11 PM	66002484953B01	\$104.76
6/7/2007	8:36:12 AM	66007805444C01	\$104.59
7/17/2007	1:08:19 PM	66001963432I01	\$103.88
6/10/2007	4:29:21 PM	66003967203F01	\$103.50
7/7/2007	9:46:39 AM	66007805444C01	\$103.28
8/3/2007	11:33:54 AM	66002938552D01	\$102.87
7/12/2007	2:37:28 PM	66002688548D01	\$102.78
6/1/2007	8:53:55 AM	66000432060C01	\$102.75
8/13/2007	1:33:15 PM	66009484878F01	\$102.73
7/12/2007	3:50:03 PM	66002807738G01	\$102.09
6/6/2007	5:37:37 PM	66004144992H01	\$102.00
8/6/2007	4:58:20 PM	66000273069F01	\$101.99
8/8/2007	2:27:44 PM	66008049143E01	\$101.98
6/9/2007	4:40:13 PM	66000471116E01	\$101.85
7/2/2007	3:05:39 PM	66006497840G01	\$101.73
8/14/2007	10:38:17 AM	66006683789J01	\$101.50
6/7/2007	11:06:45 AM	66001353344D01	\$101.33
7/11/2007	8:44:38 AM	66002284700I01	\$101.28
8/7/2007	12:32:03 PM	66000662744C01	\$101.25
7/10/2007	9:21:46 AM	66004403251E01	\$101.22

100468

10/22/2007

Page 1 of 8

TTACHMENT 4 by total amount

A.R. 114

DATE	TIME	HC	SEHOLD	AMOUNT
8/8/2007	5:45:17 PM	66009844385G01		\$101.13
8/9/2007	9:00:32 AM	66002153842G01		\$101.12
8/2/2007	8:44:16 AM	66005890801D01		\$101.07
7/3/2007	12:19:22 PM	66000955521A01		\$100.95
6/13/2007	10:37:36 AM	66000008487B01		\$100.89
7/6/2007	2:22:22 PM	66004144992H01		\$100.85
6/12/2007	10:30:31 AM	66000008487B01		\$100.79
6/2/2007	9:16:55 AM	66000432060C01		\$100.75
7/5/2007	9:09:22 AM	66006276021A01		\$100.72
8/23/2007	12:26:09 PM	66006933301B01		\$100.53
6/4/2007	10:08:07 AM	66000955521A01		\$100.32
6/6/2007	12:35:16 PM	66002527243G01		\$100.27
7/7/2007	12:14:48 PM	66000312764E01		\$100.13
6/1/2007	2:19:35 PM	66009824220J01		\$100.12
6/4/2007	2:37:17 PM	66000944001H01		\$100.12
8/9/2007	3:58:01 PM	66003980182E01		\$99.89
6/1/2007	9:47:37 AM	66003296082F01		\$99.88
6/12/2007	5:40:31 PM	66002284700I01		\$99.88
6/14/2007	10:02:09 AM	66006683789J01		\$99.87
6/4/2007	9:01:16 AM	66004211821G01		\$99.86
8/3/2007	2:11:39 PM	66004590848A01		\$99.84
8/10/2007	10:29:58 AM	66000008487B01		\$99.84
6/13/2007	12:00:45 PM	66002688548D01		\$99.83
7/12/2007	2:53:26 PM	66006968665H01		\$99.83
8/1/2007	5:50:05 PM	66005926038A01		\$99.83
8/21/2007	2:06:24 PM	66002484953B01		\$99.80
6/5/2007	9:33:56 AM	66001963432I01		\$99.78
7/13/2007	1:01:36 PM	66002982437C01		\$99.72
7/17/2007	10:44:33 PM	66008825779F01		\$99.72
6/8/2007	4:09:53 PM	66003853120I01		\$99.60
7/7/2007	3:15:50 PM	66003416574G01		\$99.58
7/7/2007	7:57:23 PM	66003623372E01		\$99.50
7/3/2007	11:25:27 AM	66001310448E01		\$98.25
7/5/2007	2:38:58 PM	66000373192E01		\$98.02
8/2/2007	12:01:07 PM	66004211821G01		\$97.89
6/7/2007	3:49:42 PM	66000662744C01		\$97.85
6/13/2007	4:12:15 PM	66000008487B01		\$97.32
8/12/2007	1:29:47 PM	66002967806H01		\$97.31
7/13/2007	9:12:24 AM	66008177628I01		\$97.03
7/12/2007	5:56:47 PM	66002381728B01		\$96.53
7/2/2007	11:01:03 AM	66004198776J02		\$96.29
7/9/2007	12:32:50 PM	66008178285G01		\$96.25
8/6/2007	8:38:56 AM	66009278163C01		\$95.67
7/7/2007	11:32:42 AM	66008395824J01		\$95.57
7/11/2007	4:57:01 PM	66000008487B01		\$95.03
6/6/2007	8:27:09 AM	66009278163C01		\$94.98
8/10/2007	8:10:38 PM	66007268483A01		\$93.99

0100468

10/22/2007

Page 2 of 8

ATTACHMENT 4 by total amount

A.R. 115

DATE	TIME	HO - EHOLD	AMOUNT
8/7/2007	8:53:07 AM	66000312764E01	\$93.85
6/5/2007	11:46:15 AM	66004590848A01	\$92.31
7/6/2007	12:06:08 PM	66006497840G01	\$92.31
7/3/2007	10:06:39 AM	66000432060C01	\$92.25
7/5/2007	8:15:51 AM	66003297522J01	\$92.14
8/8/2007	5:26:31 PM	66000154717D01	\$92.07
7/2/2007	10:10:58 AM	66000432060C01	\$91.75
7/11/2007	9:41:34 AM	66004668777I01	\$91.75
7/9/2007	9:51:25 AM	66003739765A01	\$91.35
6/29/2007	3:24:47 PM	66003176112F01	\$91.33
7/4/2007	8:25:15 PM	66005100832E01	\$91.25
8/5/2007	10:09:19 AM	66000432060C01	\$91.25
7/3/2007	11:17:30 AM	66000568051H01	\$91.24
7/10/2007	8:58:38 AM	66004767046I01	\$91.22
8/10/2007	3:47:43 PM	66005630804C01	\$91.22
7/5/2007	8:18:44 AM	66005657872H01	\$91.12
8/10/2007	3:53:52 PM	66003921297C01	\$91.05
7/13/2007	10:34:18 AM	66006683789J01	\$91.03
6/8/2007	2:52:47 PM	66008178285G01	\$89.75
7/12/2007	4:38:00 PM	66003967203F01	\$89.63
7/13/2007	9:40:24 AM	66004300629F01	\$89.63
8/3/2007	12:03:46 PM	66001310448E01	\$88.50
7/10/2007	8:28:18 AM	66002153842G01	\$88.43
7/3/2007	10:08:53 AM	66004211821G01	\$88.39
6/9/2007	9:26:27 AM	66004403251E01	\$88.36
7/2/2007	9:38:09 AM	66000922020D01	\$88.27
6/13/2007	6:51:32 PM	66002484953B01	\$88.13
6/12/2007	3:45:38 PM	66000008487B01	\$87.69
6/23/2007	11:26:45 AM	66001310448E01	\$87.68
7/5/2007	8:41:27 AM	66007484852E01	\$87.62
7/5/2007	1:45:03 PM	66003180985I01	\$87.55
6/15/2007	11:16:32 AM	66006683789J01	\$87.21
6/8/2007	8:39:59 AM	66005151019G01	\$86.63
7/12/2007	10:50:10 PM	66000471728G01	\$86.60
6/7/2007	2:48:34 PM	66000563734D01	\$86.52
7/26/2007	2:55:10 PM	66005755957H01	\$86.52
8/1/2007	11:25:28 AM	66000922020D01	\$86.35
6/8/2007	10:19:39 AM	66004572895D01	\$86.24
7/16/2007	4:42:19 PM	66002621783G01	\$85.98
7/2/2007	3:56:34 PM	66004089880B01	\$85.43
6/7/2007	8:18:17 PM	66002284700I01	\$85.32
8/14/2007	8:59:11 AM	66003648619J01	\$85.23
8/27/2007	3:49:14 PM	66002739793E01	\$85.23
8/13/2007	12:09:17 PM	66002484953B01	\$85.21
6/14/2007	3:19:40 PM	66000008487B01	\$84.62
8/9/2007	5:11:51 PM	66007232526J01	\$84.32
7/9/2007	8:52:09 AM	66002530759G01	\$83.24

0100468

10/22/2007

Page 3 of 8

ATTACHMENT 4 by total amount

A.R. 116

DATE	TIME	HC	SEHOLD	AMOUNT
7/11/2007	11:03:30 AM	66000008487B01		\$81.51
6/7/2007	6:18:52 PM	66003159342J01		\$81.45
8/2/2007	4:19:14 PM	66006497840G01		\$81.25
8/6/2007	7:01:25 PM	66002623283F01		\$81.23
7/10/2007	10:42:59 AM	66000633806F01		\$81.20
6/14/2007	5:01:12 PM	66004211851D01		\$81.00
6/7/2007	9:38:29 AM	66003958454F01		\$80.73
6/5/2007	8:52:02 AM	66002938552D01		\$80.63
7/8/2007	6:35:50 PM	66000312764E01		\$80.59
6/3/2007	11:41:31 AM	66005325470C01		\$80.38
6/7/2007	12:09:32 PM	66002460034I01		\$79.93
7/9/2007	11:24:49 AM	66000685104C01		\$79.88
8/2/2007	11:37:13 AM	66004462423H01		\$79.88
8/14/2007	12:07:30 PM	66000471728G01		\$79.88
7/7/2007	8:24:27 AM	66003958454F01		\$79.86
7/7/2007	4:40:30 PM	66002460034I01		\$79.86
8/14/2007	3:50:15 PM	66004211851D01		\$79.85
6/11/2007	12:50:40 PM	66006413612A01		\$79.84
8/10/2007	3:59:20 PM	66005647777B01		\$79.84
8/1/2007	8:36:12 PM	66004089880B01		\$79.23
7/11/2007	9:10:12 AM	66009182945H01		\$79.07
8/3/2007	8:28:51 AM	66007484852E01		\$78.34
7/6/2007	3:18:58 PM	66008893323J01		\$78.33
7/6/2007	11:37:29 AM	66000273069F01		\$78.15
7/13/2007	11:44:41 PM	66002527243G01		\$77.85
8/15/2007	6:13:36 PM	66002484953B01		\$76.99
8/16/2007	9:54:02 PM	66006354856E01		\$75.99
8/18/2007	5:16:11 PM	66003980182E01		\$75.88
6/13/2007	11:19:56 AM	66008507358D01		\$75.74
7/14/2007	8:15:49 AM	66008558779I01		\$75.42
8/10/2007	9:59:59 PM	66002368226D01		\$75.23
8/4/2007	12:19:32 PM	66002527243G01		\$75.00
6/14/2007	9:03:17 AM	66005215699J01		\$74.99
6/13/2007	4:20:19 PM	66003921297C01		\$74.93
7/18/2007	8:50:41 PM	66007232526J01		\$74.89
7/13/2007	8:57:51 AM	66009484878F01		\$74.83
8/18/2007	2:20:09 PM	66001534608D01		\$74.26
7/11/2007	7:30:20 PM	66002527243G01		\$74.23
6/10/2007	4:24:11 PM	66004595844E01		\$73.25
8/18/2007	4:15:49 PM	66001490471I01		\$73.25
7/10/2007	9:49:41 AM	66009182945H01		\$73.22
8/8/2007	1:56:03 PM	66008716515F01		\$72.98
6/16/2007	3:26:09 PM	66005666488B01		\$72.54
7/17/2007	5:59:22 PM	66004211851D01		\$72.40
7/12/2007	6:05:06 PM	66002484953B01		\$72.36
7/13/2007	10:36:07 PM	66007701476J01		\$72.36
8/2/2007	5:35:21 PM	66004703011J01		\$72.31

100468

10/22/2007

Page 4 of 8

ATTACHMENT 4 by total amount

A.R. 117



DATE	TIME	HC	SEHOLD	AMOUNT
6/14/2007	1:48:09 PM	66005666488B01		\$72.23
7/6/2007	4:50:01 PM	66004527373H01		\$72.17
6/9/2007	4:29:23 PM	66002967806H01		\$72.15
8/9/2007	4:07:54 PM	66005954073C01		\$72.15
8/16/2007	1:32:07 PM	66005666488B01		\$72.13
8/7/2007	2:14:50 PM	66001084866B01		\$72.06
8/10/2007	2:11:38 PM	66007701476J01		\$71.99
6/15/2007	10:31:08 AM	66000008487B01		\$71.97
8/22/2007	12:13:06 PM	66004733979B01		\$71.89
7/3/2007	9:08:16 AM	66010156751J01		\$71.67
8/16/2007	12:10:47 PM	66004028396C01		\$71.49
6/1/2007	1:30:30 PM	66004089880B01		\$71.25
6/5/2007	4:06:24 PM	66005325470C01		\$71.25
6/12/2007	8:50:13 PM	66004595844E01		\$71.23
7/10/2007	9:59:41 AM	66016537516D01		\$71.07
7/6/2007	6:21:33 PM	66004874633D01		\$71.03
8/9/2007	2:03:06 PM	66008716515F01		\$71.03
8/3/2007	10:32:53 AM	66004462423H01		\$70.39
7/2/2007	12:14:55 PM	66004587090E01		\$70.14
8/14/2007	12:03:07 PM	66007215489B01		\$70.06
6/11/2007	2:42:31 PM	66005090755J01		\$70.03
6/13/2007	11:32:19 AM	66005630804C01		\$69.98
6/14/2007	12:30:06 PM	66000838389F01		\$69.98
8/25/2007	5:18:32 PM	66006968665H01		\$69.98
6/1/2007	8:37:06 AM	66002739793E01		\$69.89
7/1/2007	2:06:54 PM	47F00A37211		\$69.83
8/7/2007	9:22:44 AM	66007805444C01		\$69.58
7/16/2007	1:38:50 PM	66005630804C01		\$68.86
8/28/2007	4:21:52 PM	66002739793E01		\$68.59
7/3/2007	10:46:46 AM	66002992250H01		\$68.53
8/8/2007	10:12:03 AM	66001149961D01		\$68.43
6/17/2007	2:33:01 PM	66003976819H01		\$66.57
8/2/2007	6:04:45 PM	66005325470C01		\$66.50
6/13/2007	1:19:56 PM	66004028396C01		\$66.25
8/5/2007	2:10:18 PM	66001806082C01		\$66.18
7/11/2007	3:21:49 PM	66005647777B01		\$65.71
6/22/2007	8:21:13 PM	66008893323J01		\$65.38
7/19/2007	3:01:49 PM	66006933301B01		\$65.23
6/14/2007	5:24:28 PM	66002484953B01		\$65.22
7/9/2007	10:34:31 PM	66002527243G01		\$64.85
7/5/2007	3:38:33 PM	66004590848A01		\$64.83
8/8/2007	9:56:40 AM	66009182945H01		\$64.23
8/9/2007	3:18:18 PM	66009182945H01		\$64.03
6/25/2007	4:39:14 PM	66003648619J01		\$63.63
8/2/2007	12:28:02 PM	66004198776J02		\$63.54
8/3/2007	12:57:56 PM	66006497840G01		\$63.53
8/2/2007	8:24:48 PM	66007385130F01		\$63.50

1100468

10/22/2007

ATTACHMENT 4 by total amount

Page 5 of 8

A.R. 118

DATE	TIME	HC	SEHOLD	AMOUNT
8/11/2007	8:10:21 AM	66000468465A01		\$63.29
7/7/2007	1:55:24 PM	66004323949A01		\$63.25
6/21/2007	1:55:47 PM	66004650656E01		\$63.19
6/5/2007	8:15:12 AM	66000373192E01		\$63.05
8/22/2007	2:15:40 PM	66003426039I01		\$62.97
7/13/2007	6:27:40 PM	66002484953B01		\$62.87
7/14/2007	10:05:53 AM	66000541307F01		\$62.57
6/6/2007	9:23:09 AM	66004590848A01		\$62.35
8/13/2007	6:45:04 PM	66008507358D01		\$62.35
6/6/2007	6:38:30 PM	66004874633D01		\$61.97
8/13/2007	10:38:11 AM	66008965638D01		\$61.96
6/14/2007	2:28:53 PM	66004650656E01		\$61.38
6/9/2007	12:44:53 PM	66002530759G01		\$61.32
7/21/2007	3:37:45 PM	66004514291G01		\$61.29
8/2/2007	3:43:42 PM	66005818771H01		\$61.25
8/15/2007	2:29:40 PM	66005666488B01		\$61.24
8/16/2007	3:19:12 PM	66001207168E01		\$61.24
6/7/2007	8:18:51 AM	66004101004C01		\$61.03
7/5/2007	5:22:50 PM	66007232526J01		\$61.03
6/4/2007	11:15:57 PM	66004198776J02		\$60.85
8/14/2007	3:10:41 PM	66001844359I01		\$60.50
6/10/2007	12:23:23 AM	66001084866B01		\$60.46
6/5/2007	6:40:55 PM	66001231293A01		\$60.43
8/1/2007	8:35:31 AM	66005926038A01		\$60.35
6/1/2007	10:49:09 PM	66004089880B01		\$60.27
6/22/2007	11:31:53 AM	66001036563D01		\$60.27
8/6/2007	2:17:28 PM	66010145738A01		\$59.98
8/5/2007	7:15:40 PM	66006014624I01		\$59.93
8/15/2007	1:52:25 PM	66006683789J01		\$59.93
7/2/2007	8:48:59 PM	66008770030I01		\$59.90
8/1/2007	10:56:41 AM	66004198776J02		\$59.88
6/8/2007	8:23:12 AM	66000468465A01		\$59.82
8/11/2007	9:38:31 AM	66016537516D01		\$59.68
6/9/2007	12:35:09 PM	66006354856E01		\$59.14
7/11/2007	1:08:38 PM	66006413612A01		\$58.90
6/26/2007	11:32:15 AM	66003648619J01		\$58.79
8/13/2007	9:19:43 AM	66004052838C01		\$58.69
7/2/2007	8:17:57 PM	66002851240I01		\$58.35
7/5/2007	2:05:44 PM	66010454212B01		\$58.29
7/7/2007	10:38:02 AM	66004101004C01		\$58.26
8/7/2007	2:32:25 PM	66004527373H01		\$58.25
8/10/2007	8:01:02 PM	66004154327D01		\$58.25
8/8/2007	9:16:58 AM	66002270795E01		\$58.21
7/6/2007	2:19:31 PM	66010454212B01		\$58.17
7/17/2007	3:59:19 PM	66000541307F01		\$58.07
8/8/2007	10:03:31 PM	66008178285G01		\$57.89
6/7/2007	2:27:31 PM	66004544840E01		\$57.83

100468

10/22/2007

Page 6 of 8

ATTACHMENT 4 by total amount

A.R. 119



DATE	TIME	HOUSEHOLD	AMOUNT
8/6/2007	11:54:05 AM	66006497840G01	
7/7/2007	12:26:52 PM	66000662744C01	\$57.63
7/5/2007	1:27:13 PM	66000154717D01	\$57.42
7/13/2007	6:34:20 PM	66002621783G01	\$57.12
8/15/2007	10:11:16 PM	66001207168E01	\$56.87
8/7/2007	9:01:11 AM	66004596494H01	\$56.38
8/8/2007	2:21:26 PM	66007933793H01	\$56.28
6/4/2007	4:52:12 PM	66000944001H01	\$56.05
8/7/2007	4:21:22 PM	66008395824J01	\$55.03
7/12/2007	4:05:19 PM	66000787366E01	\$54.98
7/7/2007	3:19:58 PM	66002623283F01	\$54.93
6/7/2007	5:05:23 PM	66006613220A01	\$54.33
8/6/2007	12:12:14 PM	66001036563D01	\$54.25
6/10/2007	8:46:26 PM	66009202016D01	\$54.09
8/10/2007	4:13:30 PM	66005954073C01	\$53.98
8/9/2007	4:21:09 PM	66004527373H01	\$53.69
6/5/2007	8:39:09 PM	66000568051H01	\$53.63
6/15/2007	9:44:06 PM	66006878724B01	\$53.47
8/6/2007	10:41:57 PM	66007343123B01	\$53.25
7/7/2007	12:48:36 PM	66004594852I01	\$53.14
8/6/2007	9:55:48 AM	66000432060C01	\$52.89
7/24/2007	10:15:17 AM	66005152972F01	\$52.89
6/6/2007	10:29:05 AM	66005954073C01	\$52.86
7/9/2007	8:28:50 PM	66006878724B01	\$52.84
6/8/2007	9:51:28 AM	66003739765A01	\$52.75
8/5/2007	2:54:15 PM	66003159342J01	\$52.41
7/3/2007	9:00:50 AM	66004462423H01	\$52.40
7/5/2007	9:27:17 AM	66003332612F01	\$52.36
6/9/2007	1:59:53 PM	66000662744C01	\$52.31
6/6/2007	11:03:39 AM	66003159342J01	\$52.28
8/7/2007	9:03:41 AM	66004101004C01	\$52.00
8/3/2007	3:22:50 PM	66003332612F01	\$52.00
7/6/2007	9:32:26 AM	66007648803A01	\$51.97
7/14/2007	9:39:30 PM	66002982437C01	\$51.96
8/14/2007	8:28:17 AM	66004573186G01	\$51.75
7/13/2007	1:06:58 PM	66000471728G01	\$51.74
6/6/2007	10:09:56 PM	66005744832G01	\$51.60
7/16/2007	1:09:31 PM	66006683789J01	\$51.50
7/7/2007	12:17:30 PM	66007648803A01	\$51.50
7/15/2007	4:57:26 PM	66007215489B01	\$51.45
7/2/2007	4:26:38 PM	66000762090J01	\$51.39
6/10/2007	10:44:39 AM	66000633806F01	\$51.33
7/5/2007	8:11:13 AM	66007895992B01	\$51.32
7/11/2007	7:42:52 PM	66005954073C01	\$51.27
6/9/2007	8:56:17 AM	66003839337H01	\$51.26
7/14/2007	12:38:25 PM	66005926038A01	\$51.25
8/9/2007	3:27:48 PM	66000662744C01	\$51.24
			\$51.24

100468

10/22/2007

ATTACHMENT 4 by total amount

Page 7 of 8

A.R. 120

DATE	TIME	HOUSEHOLD	AMOUNT
6/13/2007	8:21:41 AM	66004052838C01	
7/3/2007	1:37:51 PM	66008395824J01	\$51.23
7/7/2007	10:53:48 PM	66005954073C01	\$51.23
8/8/2007	5:12:47 PM	66003958454F01	\$51.23
6/5/2007	1:50:20 PM	66003332612F01	\$51.23
7/6/2007	5:24:41 PM	66005954073C01	\$51.20
8/9/2007	11:21:39 AM	66006497840G01	\$51.20
7/13/2007	1:52:47 PM	66004668777I01	\$51.20
7/3/2007	7:24:37 PM	66004462423H01	\$51.09
7/9/2007	7:36:14 PM	66000008085D01	\$51.03
8/8/2007	11:36:14 AM	66002590624J01	\$51.02
7/11/2007	3:53:22 PM	66005090755J01	\$50.89
8/10/2007	10:52:45 PM	66007573696H01	\$50.75
8/4/2007	7:48:20 PM	66004595760C01	\$50.65
6/7/2007	9:41:01 PM	66000979179J01	\$50.63
6/11/2007	10:28:25 AM	66000633806F01	\$50.56
8/14/2007	6:07:18 PM	66002982437C01	\$50.55
6/8/2007	5:32:09 PM	66005744832G01	\$50.52
8/6/2007	9:08:17 AM	66004144992H01	\$50.50
7/21/2007	8:49:07 AM	66006434346A01	\$50.29
6/7/2007	2:25:01 PM	66001353344D01	\$50.24
8/7/2007	7:48:59 PM	66002460034I01	\$50.15
			\$50.09
<b>Total Transactions</b>			<b>340</b>
			<b>\$25,957.34</b>

**ATTACHMENT 5**

In a series of Food Stamp EBT transactions, excessively large withdrawals were made from the accounts of the Food Stamp recipients.

<i>TERMINAL</i>	<i>DATE</i>	<i>TIME</i>	<i>HOUSEHOLD</i>	<i>AMOUNT</i>	<i>METHOD</i>
34534D	6/5/2007	10:28:22 AM	66001806082C01	\$127.75	key
34534D	6/12/2007	6:25:55 PM	66004244438A01	\$117.88	swipe
34534D	6/4/2007	2:08:35 PM	66000922020D01	\$112.78	key
34534D	6/14/2007	7:47:05 PM	66002982437C01	\$111.78	swipe
34534D	6/13/2007	9:23:34 AM	66000787366E01	\$111.23	key
34534D	6/1/2007	9:17:23 AM	66000972763H01	\$110.50	key
34534D	6/13/2007	10:03:09 PM	66008177628I01	\$109.77	key
34534D	6/7/2007	7:40:35 PM	66000312764E01	\$109.60	key
34534D	6/5/2007	9:27:34 AM	66007895992B01	\$109.36	swipe
34534D	6/6/2007	9:07:33 PM	66000531751G01	\$109.18	key
34534D	6/11/2007	8:32:49 AM	66004668777I01	\$109.09	key
34534D	6/1/2007	8:42:12 AM	66004126020J01	\$108.74	swipe
34534D	7/13/2007	9:58:42 AM	66005666488B01	\$108.53	key
34534D	6/8/2007	3:10:45 PM	66002144576C01	\$108.21	key
34534D	6/5/2007	7:03:14 PM	66003159342J01	\$108.10	key
34534D	8/17/2007	12:33:32 PM	66003955787B01	\$107.88	key
34534D	6/6/2007	12:26:32 PM	66000273069F01	\$107.85	key
34534D	8/13/2007	8:34:03 PM	66002381728B01	\$107.85	swipe
34534D	8/14/2007	2:05:20 PM	66005410679E01	\$107.85	key
34534D	8/10/2007	11:06:18 AM	66004668777I01	\$107.55	key
34534D	6/2/2007	1:03:01 PM	119612680101	\$107.25	swipe
34534D	6/2/2007	5:20:29 PM	66005325470C01	\$106.72	swipe
34534D	6/5/2007	12:09:15 PM	66004882802E01	\$105.63	key
34534D	6/8/2007	4:53:42 PM	66005832080F01	\$105.19	swipe
34534D	6/9/2007	11:38:21 AM	66004662306C01	\$104.85	swipe
34534D	7/12/2007	1:42:11 PM	66002484953B01	\$104.76	key
34534D	6/7/2007	8:36:12 AM	66007805444C01	\$104.59	key
34534D	7/5/2007	10:19:01 AM	66004882802E01	\$104.24	swipe
34534D	7/17/2007	1:08:19 PM	66001963432I01	\$103.88	key
34534D	7/13/2007	9:05:12 AM	66005215699J01	\$103.74	swipe
34534D	6/10/2007	4:29:21 PM	66003967203F01	\$103.50	key
34534D	8/3/2007	11:49:39 AM	66005667331C01	\$103.50	swipe
34534D	7/7/2007	9:46:39 AM	66007805444C01	\$103.28	key
34534D	8/4/2007	12:41:52 PM	66007230903C01	\$103.21	swipe
34534D	8/17/2007	4:31:46 PM	66008092290J01	\$102.98	swipe

0100468

10/22/2007

Page 1 of 8

ATTACHMENT 5 by total amount

TERMINAL	DATE	TIME	HOUSEHOLD	AMOUNT	METHOD
34534D	8/3/2007	11:33:54 AM	66002938552D01		
34534D	7/12/2007	2:37:28 PM	66002688548D01	\$102.87	key
34534D	6/1/2007	8:53:55 AM	66000432060C01	\$102.78	key
34534D	8/13/2007	1:33:15 PM	66009484878F01	\$102.75	key
34534D	8/14/2007	9:45:38 AM	66000750509C01	\$102.73	key
34534D	6/7/2007	1:50:12 PM	66008121583C01	\$102.70	swipe
34534D	7/12/2007	3:50:03 PM	66002807738G01	\$102.49	swipe
34534D	6/6/2007	5:37:37 PM	66004144992H01	\$102.09	key
34534D	8/11/2007	2:07:09 PM	710026174	\$102.00	key
34534D	8/6/2007	4:58:20 PM	66000273069F01	\$102.00	swipe
34534D	8/8/2007	2:27:44 PM	66008049143E01	\$101.99	key
34534D	6/9/2007	4:40:13 PM	66000471116E01	\$101.98	key
34534D	8/12/2007	5:53:41 PM	66009844385G01	\$101.85	key
34534D	8/3/2007	2:47:14 PM	66006276021A01	\$101.83	swipe
34534D	7/3/2007	9:05:16 PM	66004256822A01	\$101.77	swipe
34534D	6/4/2007	1:39:11 PM	66005890801D01	\$101.76	swipe
34534D	6/8/2007	8:15:17 AM	66006796525B01	\$101.74	swipe
34534D	6/14/2007	9:43:04 AM	66000750509C01	\$101.73	swipe
34534D	7/2/2007	3:05:39 PM	66006497840G01	\$101.73	swipe
34534D	8/6/2007	5:56:46 PM	710026174	\$101.73	key
34534D	8/9/2007	1:43:33 PM	66003240648A01	\$101.72	swipe
34534D	6/4/2007	10:58:15 AM	FS000001485304	\$101.72	swipe
34534D	8/14/2007	10:38:17 AM	66006683789J01	\$101.70	swipe
34534D	6/7/2007	11:06:45 AM	66001353344D01	\$101.50	key
34534D	7/11/2007	8:44:38 AM	66002284700I01	\$101.33	key
34534D	6/16/2007	5:20:57 PM	66002807738G01	\$101.28	key
34534D	8/1/2007	4:53:11 PM	66004126020J01	\$101.25	swipe
34534D	8/7/2007	12:32:03 PM	66000662744C01	\$101.25	swipe
34534D	8/9/2007	9:49:27 AM	66005401016A01	\$101.25	key
34534D	6/11/2007	10:18:20 AM	66005978107A01	\$101.25	swipe
34534D	7/10/2007	9:21:46 AM	66004403251E01	\$101.23	swipe
34534D	8/8/2007	5:45:17 PM	66009844385G01	\$101.22	key
34534D	8/9/2007	9:00:32 AM	66002153842G01	\$101.13	key
34534D	6/5/2007	9:17:10 AM	66006276021A01	\$101.12	key
34534D	6/13/2007	9:30:14 PM	66004256822A01	\$101.09	swipe
34534D	8/2/2007	8:44:16 AM	66005890801D01	\$101.07	swipe
34534D	8/4/2007	5:40:26 PM	710026174	\$101.07	key
34534D	7/3/2007	12:19:22 PM	66000955521A01	\$101.03	swipe
34534D	6/13/2007	10:37:36 AM	66000008487B01	\$100.95	key
34534D	7/6/2007	2:22:22 PM	66004144992H01	\$100.89	key
34534D	8/10/2007	1:50:01 PM	66009202016D01	\$100.85	key
34534D	6/12/2007	10:30:31 AM	66000008487B01	\$100.85	swipe
				\$100.79	key

0100468

10/22/2007

ATTACHMENT 5 by total amount

Page 2 of 8

A.R. 123

TERMINAL	DATE	TIME	HOUSEHOLD	AMOUNT	METHOD
34534D	6/2/2007	9:16:55 AM	66000432060C01	\$100.75	key
34534D	7/5/2007	9:09:22 AM	66006276021A01	\$100.72	key
34534D	8/23/2007	12:26:09 PM	66006933301B01	\$100.53	key
34534D	6/4/2007	10:08:07 AM	66000955521A01	\$100.32	key
34534D	6/6/2007	12:35:16 PM	66002527243G01	\$100.27	key
34534D	6/9/2007	12:40:29 PM	66006727612B01	\$100.24	swipe
34534D	6/2/2007	8:25:49 PM	47F00A37211	\$100.19	swipe
34534D	7/7/2007	12:14:48 PM	66000312764E01	\$100.13	key
34534D	6/1/2007	2:19:35 PM	66009824220J01	\$100.12	key
34534D	6/4/2007	2:37:17 PM	66000944001H01	\$100.12	key
34534D	6/11/2007	4:24:31 PM	66005801127B01	\$100.05	swipe
34534D	6/4/2007	1:34:30 PM	66001149961D01	\$99.98	swipe
34534D	8/9/2007	3:58:01 PM	66003980182E01	\$99.89	key
34534D	8/14/2007	7:59:48 PM	66002807738G01	\$99.89	swipe
34534D	6/1/2007	9:47:37 AM	66003296082F01	\$99.88	key
34534D	6/12/2007	5:40:31 PM	66002284700I01	\$99.88	key
34534D	6/14/2007	10:02:09 AM	66006683789J01	\$99.87	key
34534D	6/4/2007	9:01:16 AM	66004211821G01	\$99.86	key
34534D	8/3/2007	2:11:39 PM	66004590848A01	\$99.84	key
34534D	8/10/2007	10:29:58 AM	66000008487B01	\$99.84	key
34534D	6/13/2007	12:00:45 PM	66002688548D01	\$99.83	key
34534D	7/12/2007	2:53:26 PM	66006968665H01	\$99.83	key
34534D	8/1/2007	5:50:05 PM	66005926038A01	\$99.83	key
34534D	8/14/2007	10:43:10 AM	66008166085E01	\$99.83	swipe
34534D	7/10/2007	8:44:29 AM	66009202016D01	\$99.82	swipe
34534D	7/13/2007	3:53:25 PM	66004585479B01	\$99.80	swipe
34534D	8/21/2007	2:06:24 PM	66002484953B01	\$99.80	key
34534D	6/5/2007	9:33:56 AM	66001963432I01	\$99.78	key
34534D	6/7/2007	1:26:49 PM	66010483494A01	\$99.72	swipe
34534D	7/13/2007	1:01:36 PM	66002982437C01	\$99.72	key
34534D	7/17/2007	10:44:33 PM	66008825779F01	\$99.72	key
34534D	6/8/2007	4:09:53 PM	66003853120I01	\$99.60	key
34534D	7/7/2007	3:15:50 PM	66003416574G01	\$99.58	key
34534D	7/7/2007	7:57:23 PM	66003623372E01	\$99.50	key
34534D	6/7/2007	7:43:36 PM	66002590624J01	\$99.47	swipe
34534D	6/2/2007	9:27:36 PM	119612680101	\$98.65	swipe
34534D	7/3/2007	11:25:27 AM	66001310448E01	\$98.25	key
34534D	7/5/2007	2:38:58 PM	66000373192E01	\$98.02	key
34534D	7/8/2007	4:39:51 PM	66002590624J01	\$97.89	swipe
34534D	8/2/2007	12:01:07 PM	66004211821G01	\$97.89	key
34534D	6/7/2007	3:49:42 PM	66000662744C01	\$97.85	key
34534D	6/13/2007	4:12:15 PM	66000008487B01	\$97.32	key

0100468

10/22/2007

Page 3 of 8

ATTACHMENT 5 by total amount

<i>TERMINAL</i>	<i>DATE</i>	<i>TIME</i>	<i>HOUSEHOLD</i>	<i>AMOUNT</i>	<i>METHOD</i>
34534D	8/12/2007	1:29:47 PM	66002967806H01	\$97.31	key
34534D	7/13/2007	9:12:24 AM	66008177628I01	\$97.03	key
34534D	7/12/2007	5:56:47 PM	66002381728B01	\$96.53	key
34534D	7/2/2007	11:01:03 AM	66004198776J02	\$96.29	key
34534D	7/9/2007	12:32:50 PM	66008178285G01	\$96.25	key
34534D	8/6/2007	8:38:56 AM	66009278163C01	\$95.67	key
34534D	8/10/2007	4:06:55 PM	66003752064A01	\$95.63	swipe
34534D	7/7/2007	11:32:42 AM	66008395824J01	\$95.57	key
34534D	8/8/2007	5:31:01 PM	66000751833F01	\$95.43	swipe
34534D	7/11/2007	4:57:01 PM	66000008487B01	\$95.03	key
34534D	6/6/2007	8:27:09 AM	66009278163C01	\$94.98	key
34534D	7/11/2007	4:49:58 PM	66004539290J01	\$94.15	swipe
34534D	7/9/2007	10:33:21 AM	66007217700J01	\$94.13	swipe
34534D	8/10/2007	8:10:38 PM	66007268483A01	\$93.99	key
34534D	8/7/2007	8:53:07 AM	66000312764E01	\$93.85	key
34534D	6/5/2007	12:27:32 PM	66006893231I01	\$92.50	swipe
34534D	6/5/2007	11:46:15 AM	66004590848A01	\$92.31	key
34534D	7/6/2007	12:06:08 PM	66006497840G01	\$92.31	key
34534D	7/3/2007	10:06:39 AM	66000432060C01	\$92.25	key
34534D	7/5/2007	8:15:51 AM	66003297522J01	\$92.14	key
34534D	8/8/2007	5:26:31 PM	66000154717D01	\$92.07	key
34534D	7/2/2007	10:10:58 AM	66000432060C01	\$91.75	key
34534D	7/11/2007	9:41:34 AM	66004668777I01	\$91.75	key
34534D	7/9/2007	9:51:25 AM	66003739765A01	\$91.35	key
34534D	6/29/2007	3:24:47 PM	66003176112F01	\$91.33	key
34534D	7/4/2007	8:25:15 PM	66005100832E01	\$91.25	key
34534D	8/5/2007	10:09:19 AM	66000432060C01	\$91.25	key
34534D	7/3/2007	11:17:30 AM	66000568051H01	\$91.24	key
34534D	7/10/2007	8:58:38 AM	66004767046I01	\$91.22	key
34534D	8/10/2007	3:47:43 PM	66005630804C01	\$91.22	key
34534D	7/5/2007	8:18:44 AM	66005657872H01	\$91.12	key
34534D	8/10/2007	3:53:52 PM	66003921297C01	\$91.05	key
34534D	7/13/2007	10:34:18 AM	66006683789J01	\$91.03	key
34534D	8/9/2007	10:51:02 AM	66005890801D01	\$90.83	swipe
34534D	6/8/2007	4:00:40 PM	66004001985D01	\$90.63	swipe
34534D	7/8/2007	1:17:56 PM	66006727612B01	\$90.14	swipe
34534D	6/8/2007	2:52:47 PM	66008178285G01	\$89.75	key
34534D	7/12/2007	4:38:00 PM	66003967203F01	\$89.63	key
34534D	7/13/2007	9:40:24 AM	66004300629F01	\$89.63	key
34534D	7/9/2007	9:21:30 AM	66001149961D01	\$89.52	swipe
34534D	8/9/2007	11:09:41 AM	66004662306C01	\$89.09	swipe
34534D	8/4/2007	12:50:45 PM	66001806082C01	\$88.93	swipe

0100468

10/22/2007

Page 4 of 8

ATTACHMENT 5 by total amount



<i>TERMINAL</i>	<i>DATE</i>	<i>TIME</i>	<i>HOUSEHOLD</i>	<i>AMOUNT</i>	<i>METHOD</i>
34534D	8/3/2007	12:03:46 PM	66001310448E01	\$88.50	key
34534D	8/8/2007	3:51:32 PM	66001129505C01	\$88.49	swipe
34534D	7/10/2007	8:28:18 AM	66002153842G01	\$88.43	key
34534D	7/3/2007	10:08:53 AM	66004211821G01	\$88.39	key
34534D	6/9/2007	9:26:27 AM	66004403251E01	\$88.36	key
34534D	7/2/2007	9:38:09 AM	66000922020D01	\$88.27	key
34534D	6/13/2007	6:51:32 PM	66002484953B01	\$88.13	key
34534D	6/12/2007	3:45:38 PM	66000008487B01	\$87.69	key
34534D	6/23/2007	11:26:45 AM	66001310448E01	\$87.68	key
34534D	7/5/2007	8:41:27 AM	66007484852E01	\$87.62	key
34534D	7/5/2007	1:45:03 PM	66003180985I01	\$87.55	key
34534D	6/15/2007	11:16:32 AM	66006683789J01	\$87.21	key
34534D	6/10/2007	11:01:44 AM	66006796525B01	\$86.87	swipe
34534D	6/8/2007	8:39:59 AM	66005151019G01	\$86.63	key
34534D	7/12/2007	10:50:10 PM	66000471728G01	\$86.60	key
34534D	6/7/2007	2:48:34 PM	66000563734D01	\$86.52	key
34534D	7/26/2007	2:55:10 PM	66005755957H01	\$86.52	key
34534D	8/1/2007	11:25:28 AM	66000922020D01	\$86.35	key
34534D	6/6/2007	5:14:40 PM	66004527373H01	\$86.32	swipe
34534D	6/8/2007	10:19:39 AM	66004572895D01	\$86.24	key
34534D	7/16/2007	4:42:19 PM	66002621783G01	\$85.98	key
34534D	7/6/2007	11:53:38 AM	66005890801D01	\$85.78	swipe
34534D	7/2/2007	3:56:34 PM	66004089880B01	\$85.43	key
34534D	6/7/2007	8:18:17 PM	66002284700I01	\$85.32	key
34534D	8/14/2007	8:59:11 AM	66003648619J01	\$85.23	key
34534D	8/27/2007	3:49:14 PM	66002739793E01	\$85.23	key
34534D	8/13/2007	12:09:17 PM	66002484953B01	\$85.21	key
34534D	6/7/2007	8:32:03 AM	66002590624J01	\$84.99	swipe
34534D	6/14/2007	3:19:40 PM	66000008487B01	\$84.62	key
34534D	8/9/2007	5:11:51 PM	66007232526J01	\$84.32	key
34534D	7/9/2007	8:52:09 AM	66002530759G01	\$83.24	key
34534D	7/12/2007	9:21:02 PM	66003921297C01	\$82.25	swipe
34534D	7/7/2007	12:03:41 PM	66010613894E01	\$82.12	swipe
34534D	7/11/2007	11:03:30 AM	66000008487B01	\$81.51	key
34534D	7/28/2007	8:29:59 AM	66008183272H01	\$81.47	swipe
34534D	6/7/2007	6:18:52 PM	66003159342J01	\$81.45	key
34534D	6/22/2007	8:52:52 AM	66002228115I01	\$81.37	swipe
34534D	7/12/2007	10:03:58 AM	66005890801D01	\$81.37	swipe
34534D	8/2/2007	4:19:14 PM	66006497840G01	\$81.25	key
34534D	8/7/2007	6:46:05 PM	66006917152I01	\$81.25	swipe
34534D	8/6/2007	7:01:25 PM	66002623283F01	\$81.23	key
34534D	7/10/2007	10:42:59 AM	66000633806F01	\$81.20	key

0100468

10/22/2007

Page 5 of 8

ATTACHMENT 5 by total amount

<i>TERMINAL</i>	<i>DATE</i>	<i>TIME</i>	<i>HOUSEHOLD</i>	<i>AMOUNT</i>	<i>METHOD</i>
34534D	6/14/2007	5:01:12 PM	66004211851D01	\$81.00	key
34534D	6/7/2007	9:38:29 AM	66003958454F01	\$80.73	key
34534D	6/11/2007	8:40:46 AM	66005647777B01	\$80.72	swipe
34534D	6/5/2007	8:52:02 AM	66002938552D01	\$80.63	key
34534D	7/8/2007	6:35:50 PM	66000312764E01	\$80.59	key
34534D	6/3/2007	11:41:31 AM	66005325470C01	\$80.38	key
34534D	6/7/2007	12:09:32 PM	66002460034I01	\$79.93	key
34534D	7/13/2007	11:15:04 AM	66000750509C01	\$79.91	swipe
34534D	7/9/2007	11:24:49 AM	66000685104C01	\$79.88	key
34534D	8/2/2007	11:37:13 AM	66004462423H01	\$79.88	key
34534D	8/14/2007	12:07:30 PM	66000471728G01	\$79.88	key
34534D	7/7/2007	8:24:27 AM	66003958454F01	\$79.86	key
34534D	7/7/2007	4:40:30 PM	66002460034I01	\$79.86	key
34534D	8/14/2007	3:50:15 PM	66004211851D01	\$79.85	key
34534D	6/11/2007	12:50:40 PM	66006413612A01	\$79.84	key
34534D	8/10/2007	3:59:20 PM	66005647777B01	\$79.84	key
34534D	6/8/2007	1:18:17 PM	66004337369F01	\$79.46	swipe
34534D	8/1/2007	8:36:12 PM	66004089880B01	\$79.23	key
34534D	7/11/2007	9:10:12 AM	66009182945H01	\$79.07	key
34534D	8/3/2007	8:28:51 AM	66007484852E01	\$78.34	key
34534D	7/6/2007	3:18:58 PM	66008893323J01	\$78.33	key
34534D	8/7/2007	10:29:56 AM	66002590624J01	\$78.24	swipe
34534D	7/6/2007	11:37:29 AM	66000273069F01	\$78.15	key
34534D	7/9/2007	6:20:37 PM	66001129505C01	\$77.90	swipe
34534D	7/13/2007	11:44:41 PM	66002527243G01	\$77.85	key
34534D	8/3/2007	4:35:25 PM	66006612871B01	\$77.50	swipe
34534D	6/14/2007	1:04:14 PM	66008507358D01	\$77.13	swipe
34534D	8/15/2007	6:13:36 PM	66002484953B01	\$76.99	key
34534D	6/14/2007	6:01:18 PM	66003921297C01	\$76.33	swipe
34534D	8/16/2007	9:54:02 PM	66006354856E01	\$75.99	key
34534D	8/18/2007	5:16:11 PM	66003980182E01	\$75.88	key
34534D	6/13/2007	11:19:56 AM	66008507358D01	\$75.74	key
34534D	7/14/2007	8:15:49 AM	66008558779I01	\$75.42	key
34534D	8/10/2007	9:59:59 PM	66002368226D01	\$75.23	key
34534D	7/6/2007	12:40:16 PM	66001663172D01	\$75.12	swipe
34534D	8/4/2007	12:19:32 PM	66002527243G01	\$75.00	key
34534D	6/14/2007	9:03:17 AM	66005215699J01	\$74.99	key
34534D	6/13/2007	4:20:19 PM	66003921297C01	\$74.93	key
34534D	7/18/2007	8:50:41 PM	66007232526J01	\$74.89	key
34534D	7/13/2007	8:57:51 AM	66009484878F01	\$74.83	key
34534D	8/18/2007	2:20:09 PM	66001534608D01	\$74.26	key
34534D	7/17/2007	1:00:35 PM	66008507358D01	\$74.25	swipe

0100468

10/22/2007

Page 6 of 8

ATTACHMENT 5 by total amount

A.R. 127



<i>TERMINAL</i>	<i>DATE</i>	<i>TIME</i>	<i>HOUSEHOLD</i>	<i>AMOUNT</i>	<i>METHOD</i>
34534D	7/11/2007	7:30:20 PM	66002527243G01	\$74.23	key
34534D	7/9/2007	4:16:36 PM	66003568435G01	\$74.09	swipe
34534D	7/6/2007	3:46:57 PM	66007230903C01	\$73.77	swipe
34534D	7/10/2007	10:47:52 AM	66004662306C01	\$73.55	swipe
34534D	6/10/2007	4:24:11 PM	66004595844E01	\$73.25	key
34534D	8/18/2007	4:15:49 PM	66001490471I01	\$73.25	key
34534D	7/10/2007	9:49:41 AM	66009182945H01	\$73.22	key
34534D	8/8/2007	1:56:03 PM	66008716515F01	\$72.98	key
34534D	6/7/2007	12:14:15 PM	66000510791H01	\$72.66	swipe
34534D	6/16/2007	3:26:09 PM	66005666488B01	\$72.54	key
34534D	8/10/2007	10:10:01 AM	66005401016A01	\$72.43	swipe
34534D	7/17/2007	5:59:22 PM	66004211851D01	\$72.40	key
34534D	7/12/2007	6:05:06 PM	66002484953B01	\$72.36	key
34534D	7/13/2007	10:36:07 PM	66007701476J01	\$72.36	key
34534D	8/2/2007	5:35:21 PM	66004703011J01	\$72.31	key
34534D	6/14/2007	1:48:09 PM	66005666488B01	\$72.23	key
34534D	7/6/2007	4:50:01 PM	66004527373H01	\$72.17	key
34534D	6/9/2007	4:29:23 PM	66002967806H01	\$72.15	key
34534D	8/9/2007	4:07:54 PM	66005954073C01	\$72.15	key
34534D	8/16/2007	1:32:07 PM	66005666488B01	\$72.13	key
34534D	7/13/2007	3:15:14 PM	66008507358D01	\$72.10	swipe
34534D	8/7/2007	2:14:50 PM	66001084866B01	\$72.06	key
34534D	8/10/2007	2:11:38 PM	66007701476J01	\$71.99	key
34534D	6/15/2007	10:31:08 AM	66000008487B01	\$71.97	key
34534D	6/8/2007	8:07:44 AM	66001066805B01	\$71.93	swipe
34534D	6/12/2007	3:56:27 PM	66003840615D01	\$71.89	swipe
34534D	8/22/2007	12:13:06 PM	66004733979B01	\$71.89	key
34534D	7/3/2007	9:08:16 AM	66010156751J01	\$71.67	key
34534D	8/16/2007	12:10:47 PM	66004028396C01	\$71.49	key
34534D	8/10/2007	3:40:57 PM	66002278995C01	\$71.27	swipe
34534D	6/1/2007	1:30:30 PM	66004089880B01	\$71.25	key
34534D	6/5/2007	4:06:24 PM	66005325470C01	\$71.25	key
34534D	7/10/2007	2:49:35 PM	66006654586E01	\$71.25	swipe
34534D	6/12/2007	8:50:13 PM	66004595844E01	\$71.23	key
34534D	7/10/2007	9:59:41 AM	66016537516D01	\$71.07	key
34534D	7/6/2007	6:21:33 PM	66004874633D01	\$71.03	key
34534D	8/9/2007	2:03:06 PM	66008716515F01	\$71.03	key
34534D	8/3/2007	6:40:40 PM	47F00A37211	\$70.71	swipe
34534D	8/3/2007	10:32:53 AM	66004462423H01	\$70.39	key
34534D	8/16/2007	4:41:56 PM	66005755537H01	\$70.25	swipe
34534D	8/13/2007	7:15:54 PM	66005737238F01	\$70.23	swipe
34534D	7/2/2007	12:14:55 PM	66004587090E01	\$70.14	key

0100468

10/22/2007

Page 7 of 8

ATTACHMENT 5 by total amount

<i>TERMINAL</i>	<i>DATE</i>	<i>TIME</i>	<i>HOUSEHOLD</i>	<i>AMOUNT</i>	<i>METHOD</i>
34534D	6/13/2007	3:29:28 PM	66005890801D01	\$70.12	swipe
34534D	8/14/2007	12:03:07 PM	66007215489B01	\$70.06	key
34534D	6/11/2007	2:42:31 PM	66005090755J01	\$70.03	key
<i>Total Transactions</i>			290	\$26,208.61	

0100468

10/22/2007

Page 8 of 8

ATTACHMENT 5 by total amount

A.R. 129

# CASE ANALYSIS

EBT Paper Case Analysis**I. Profile**

**Store Name:** Ivana Grocery Store

**Address:** 1665 Topping Ave  
Bronx, NY 10457

**Owner:** Franklyn F. Lugo

**Authorization Number:** 0100468

**Authorization Date:** March 20, 2007

**Store Type:** Small Grocery Store

**Contractor Store Visit:** March 11, 2007

**FNS Store Visit:** October 1, 2007

**Average Monthly Redemptions:** \$15,660.00

**Total Redemptions during Review Period:** \$58,756.20

**Prior compliance history:** NONE

**Analysis:****FNS store visit summary:**

On October 1, 2007 FNS staffers visited subject store in an attempt to explain the questionable transaction patters revealed by ALERT.

During the visit, FNS staffers spoke with Xiomara Guzman, manager of Ivana Grocery Store. FNS staffers observed and confirmed the following:

- Number of registers one
- Number of POS terminal one
- Store Hours: 7:00 A.M. to 1:00 A.M. (7)
- Night window hours none (How ever, observed a sealed night window but manager stated that it is not in use)
- Number of employees two
- Adding machines / calculators two
- Shopping carts none
- Baskets none
- The most expensive food items are Gallon of cooking oil (\$9.99) Boxes of cold / dry cereal (\$5.69 ea) and Canned Planters Peanuts ( \$4.89)
- There are no specials or family packs
- Store does not participates in WIC program
- Credit is not extended to food stamp customers
- Totals are not rounded-off
- Phone orders are not part of their services provided to food stamp customers
- Home delivery is provide sporadically only two blocks radius
- Manager stated that store had no problems swiping EBT cards
- Prices of merchandise ended in a variations of \$0.X9 cents value
- Items are not price per case, per carton, or in bulk
- Store does not sell fresh meats, poultry, or sea food
- The deli case had limited variety and limited quantity of cold cuts
- Observed some dusty canned goods
- Store carries limited variety of staple food
- The counter space dimensions are about 3' x 2'

- o The counter was not surrounded by plexiglass and had no conveyor belt or optical scanner to expedite transactions
- o The area behind the counter was narrow ( about 3' by 7' )
- o The size of the store was approximately 17' by 35' and had three narrow aisles
- o Store had a limited variety and limited quantity of produce
- o As per manager the basement is consider the storage area but only had a walk-in refrigerator for milk
- o Store does not carry expensive food items
- o Store has not been renovated or expanded
- o Store had a moderate quantity of expired Baby Cereal. Manager was told to remove them immediately. Advised manager to check the rest of the inventory in the store to insure that no expired food remained on shelves

FNS staffers observed suspicious eye signals and body language between manager and some customers during the visit.

Our visit to the store did not help us explain the store's questionable transactions found in the ALERT data. The store visit confirmed our suspicion that the store is trafficking. Following is a review of each ALERT scan for the months of June, July and August 2007 in relation to information gathered (including the store survey, our analysis of client data, customers shopping patterns, and other stores in the area.

This store hit on the following ALERT scans with transactions that are atypical for the reasons described below:

Attachment 1 – Scand B1, rapid and repetitive transactions in a short period of time, any household/account:

- o Store has only one register
- o Observed dusty food inventory
- o Store has limited counter space
- o Store has one Point of Sale device
- o Store lacks optical scanner technology
- o There is no conveyer belt at the counter
- o Phone orders are not taken at subject firm
- o Credit is not extended to food stamp customers

ALERT system targets food stamp transactions conducted within implausibly short timeframes, using the EBT terminal (POS device). This store conducted a disproportionate number of consecutive food stamp transactions within timeframes that appear unreasonable in comparison to other authorized firms. Examples of these transactions are given below

<b>DATE</b>	<b>TIME</b>		<b>HOUSEHOLD</b>	<b>AMT</b>	<b>TOTAL AMT</b>
6/2/2007	1:00:13 PM		66002597530B01	\$30.05	
6/2/2007	1:03:01 PM		119612680101	\$107.25	
Total Time:		2 minutes	48 seconds		\$137.30
7/6/2007	2:19:31 PM		66010454212B01	\$58.17	
7/6/2007	2:22:22 PM		66004144992H01	\$100.85	
Total Time:		2 minutes	51 seconds		\$159.02

DATE	TIME	HOUSEHOLD	AMT	TOTAL AMT
7/3/2007	10:06:39 AM	66000432060C01	\$92.25	
7/3/2007	10:08:53 AM	66004211821G01	\$88.39	
Total Time:	2 minutes	14 seconds		\$180.64
7/6/2007	11:37:29 AM	66000273069F01	\$78.15	
7/6/2007	11:40:16 AM	66007577873I01	\$59.47	
Total Time:	2 minutes	47 seconds		\$137.62
8/8/2007	3:48:34 PM	66004595760C01	\$28.03	
8/8/2007	3:51:32 PM	66001129505C01	\$88.49	
Total Time:	2 minutes	58 seconds		\$116.52
8/14/2007	10:38:17 AM	66006683789J01	\$101.50	
8/14/2007	10:43:10 AM	66008166085E01	\$99.83	
Total Time:	4 minutes	53 seconds		\$201.33

Attachment 2 – Scand B2, rapid and repetitive transactions in a short period of time, same household/account:

- o Phone orders are not part of the services provided to food stamp customers
- o Store does not sell fresh meats, poultry or sea food
- o Store has no baskets or shopping carts in order to assist customers
- o Store had a limited selection of fresh fruits and vegetables
- o Observed dusty canned goods and dusty food items
- o Credit is not extended to food stamp customers
- o Store does not offer specials or incentives to entice customers to shop

The ALERT system targets food stamp transactions conducted within implausibly short timeframes, using the EBT terminal (POS device). This store conducted disproportionate number food stamp transactions with the same household on the same day. These transactions are unreasonable in comparison with other authorized firms of the same store type. Examples of those transactions are given below:

DATE	TIME	HOUSEHOLD	AMT	TOTAL AMT
8/4/2007	12:16:06 PM	66002527243G01	\$42.50 key	
8/4/2007	12:19:32 PM	66002527243G01	\$75.00 key	
Total Time:	0 hours 3 minutes	26 seconds	Total Amount:	\$117.50
6/8/2007	8:02:54 AM	66002270795E01	\$69.75 swipe	
6/8/2007	8:11:17 AM	66002270795E01	\$41.24 swipe	
Total Time:	0 hours 8 minutes	23 seconds	Total Amount:	\$110.99
6/4/2007	2:37:17 PM	66000944001H01	\$100.12 key	
6/4/2007	4:52:12 PM	66000944001H01	\$55.03 key	
Total Time:	2 hours 14 minutes	55 seconds	Total Amount:	\$155.15

DATE	TIME	HOUSEHOLD	AMT	TOTAL AMT
7/9/2007	6:20:37 PM	66001129505C01	\$77.90 swipe	
7/9/2007	8:51:21 PM	66001129505C01	\$48.17 swipe	
Total Time:	2 hours 30 minutes 44 seconds		Total Amount:	\$126.07
6/9/2007	6:00:52 PM	66009202016D01	\$50.70 swipe	
6/9/2007	8:34:30 PM	66009202016D01	\$49.83 swipe	
Total Time:	2 hours 33 minutes 38 seconds		Total Amount:	\$100.53
7/12/2007	2:37:28 PM	66002688548D01	\$102.78 key	
7/12/2007	5:25:33 PM	66002688548D01	\$36.75 key	
Total Time:	2 hours 48 minutes 5 seconds		Total Amount	\$139.53

**Attachment 3 - Scan C, depletion of the majority or all of a clients benefit in a short timeframe:**

- o Store does not sell fresh meats, poultry or sea food
- o Store does not sell frozen food
- o Observed very dusty canned goods and expired baby cereal
- o Store had limited quantity and limited variety of staple food
- o Store does not extent credit to the food stamp customers
- o There are no baskets or shopping carts for customers to carry their food to the counter
- o The store area only had a refrigerator with milk
- o There are well stocked stores authorized in the area where food stamp customers can shop

Clients' beginning balance of EBT benefits were depleted by one or few transactions. These monthly food stamp benefits were depleted in an unusually short timeframe. Examples of these transactions are given below:

DATE	TIME	HOUSEHOLD	AMT	BALANCE
8/8/2007	5:31:01 PM	66000751833F01	\$95.43 swipe	\$0.14
Total:	1 Total Time: 0 hours 0 minutes 0 seconds		Total Amount:	\$95.43
8/10/2007	4:06:55 PM	66003752064A01	\$95.63 swipe	\$0.85
Total:	1 Total Time: 0 hours 0 minutes 0 seconds		Total Amount:	\$95.63
8/8/2007	5:26:31 PM	66000154717D01	\$92.07 key	\$0.43
Total:	1 Total Time: 0 hours 0 minutes 0 seconds		Total Amount:	\$92.07
7/11/2007	4:49:58 PM	66004539290J01	\$94.15 swipe	\$0.01
Total:	1 Total Time: 0 hours 0 minutes 0 seconds		Total Amount:	\$94.15
8/9/2007	10:51:02 AM	66005890801D01	\$90.83 swipe	\$0.86
Total:	1 Total Time: 0 hours 0 minutes 0 seconds		Total Amount:	\$90.83



DATE	TIME	HOUSEHOLD	AMT	BALANCE
6/5/2007	12:27:32 PM	66006893231I01	\$92.50 swipe	\$0.02
Total:	1	Total Time: 0 hours 0 minutes 0 seconds	Total Amount:	\$92.50
8/17/2007	4:31:46 PM	66008092290J01	\$102.98 swipe	\$0.06
Total:	1	Total Time: 0 hours 0 minutes 0 seconds	Total Amount:	\$102.98
6/8/2007	8:02:54 AM	66002270795E01	\$69.75 swipe	\$41.25
6/8/2007	8:11:17 AM	66002270795E01	\$41.24 swipe	\$0.01
Total:	2	Total Time: 0 hours 8 minutes 23 seconds	Total Amount:	\$110.99
6/4/2007	2:37:17 PM	66000944001H01	\$100.12 key	\$55.17
6/4/2007	4:52:12 PM	66000944001H01	\$55.03 key	\$0.14
Total:	2	Total Time: 2 hours 14 minutes 55 seconds	Total Amount:	\$155.15

**Attachment 4 - Scan D- Excessively large number of key-entered food stamp EBT transactions.**

- o Manager stated that they had no problems swiping the EBT cards
- o Manager stated that he never experience any problems with the POS machine

This store conducted a disproportionate number of key-entered food stamp transactions that were not caused by equipment failure and indicate that the transactions were made without the card present. Below are examples of transactions where client cards were key-entered at this location yet successfully swiped at the same location on the same day:

Method 1 indicates the card was key-entered. Method 0 indicates a normal swipe.

Store ID	XTN Date	XTN Time	Store Type	Terminal ID	Household #	Amount	XTN Type	Total Amt
0100468	6/12/2007	2:54:30PM	SG	34534D	66004244438A01	\$40.31	1	
0100468	6/12/2007	6:25:55 PM	SG	34534D	66004244438A01	\$117.88	0	\$158.19
0100468	6/13/2007	9:23:34AM	SG	34534D	66000787366E01	\$111.23	1	
0100468	6/13/2007	1:12:18PM	SG	34534D	66000787366E01	\$43.50	0	\$154.73
0100468	6/13/2007	8:21:41AM	SG	34534D	66004052838C01	\$51.23	1	
0100468	6/13/2007	6:25:15PM	SG	34534D	66004052838C01	\$51.17	0	\$102.40
0100468	7/14/2007	12:38:25PM	SG	34534D	66005926038A01	\$51.24	1	
0100468	7/14/2007	10:24:25 PM	SG	34534D	66005926038A01	\$49.93	0	\$101.17
0100468	8/8/2007	10:12:03 AM	SG	34534D	66001149961D01	\$68.43	1	
0100468	8/8/2007	12:47:14 PM	SG	34534D	66001149961D01	\$29.65	0	\$98.08



**Attachment 5 - Scan F. high dollar transactions:**

- o The store does not sell food in bulk
- o There are no fresh meats, poultry or fresh sea food
- o The store does not carry expensive food items
- o The store had limited selection of produce
- o Food items are not priced per case or per carton
- o The deli case had small pieces of meat sparsely inside the deli case
- o Credit is not extended to food stamp customers
- o This is a small grocery store approximately size is 17' by 35' Store had three narrow aisles
- o Store's stock does not justify high dollar transactions
- o Store does not provide phone orders services to food stamp customers; delivery service is done sporadically
- o As per manager and observation, store has no specials or package deals
- o Store carries a variety of beer and sodas
- o There are no shopping carts or baskets to carry large purchases to the counter
- o Observed dusty food items

This store conducted a disproportionate number of high dollar food stamp transactions that appear unreasonable in comparison to the store stock. The following examples represent unreasonable transactions.

<b>DATE</b>	<b>TIME</b>	<b>HOUSEHOLD</b>	<b>AMOUNT</b>
6/5/2007	10:28:22 AM	66001806082C01	\$127.75
6/12/2007	6:25:55 PM	66004244438A01	\$117.88
6/4/2007	2:08:35 PM	66000922020D01	\$112.78
6/14/2007	7:47:05 PM	66002982437C01	\$111.78
6/13/2007	9:23:34 AM	66000787366E01	\$111.23
6/1/2007	9:17:23 AM	66000972763H01	\$110.50
6/13/2007	10:03:09 PM	66008177628I01	\$109.77
6/7/2007	7:40:35 PM	66000312764E01	\$109.60
6/5/2007	9:27:34 AM	66007895992B01	\$109.36
6/6/2007	9:07:33 PM	66000531751G01	\$109.18
6/11/2007	8:32:49 AM	66004668777I01	\$109.09
6/1/2007	8:42:12 AM	66004126020J01	\$108.74
7/13/2007	9:58:42 AM	66005666488B01	\$108.53
6/8/2007	3:10:45 PM	66002144576C01	\$108.21
6/5/2007	7:03:14 PM	66003159342J01	\$108.10

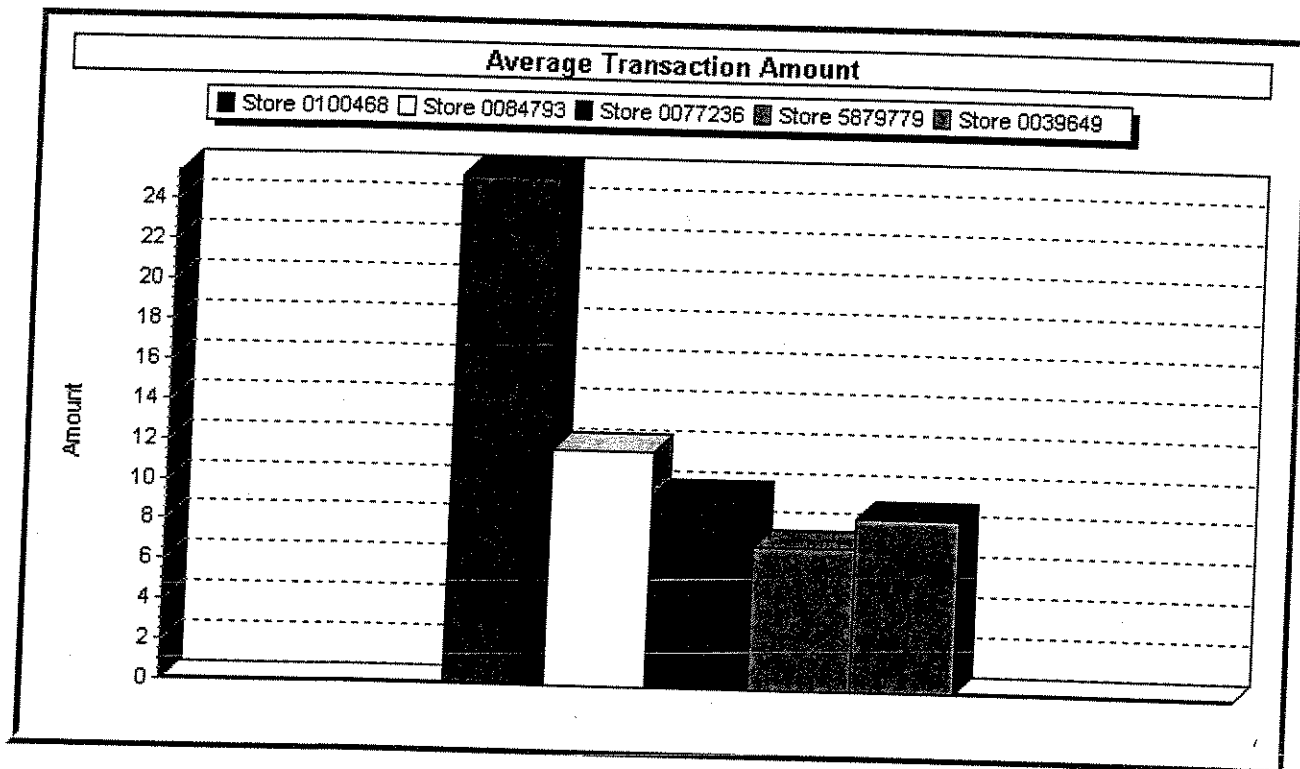
### III. Other Stores in the Area

There are 68 small grocery stores, 13 medium grocery stores; 4 supermarkets and 2 super stores well stocked and authorized to accept food stamps in the area.

The chart below compares Ivana Grocery Store average transactions to competitors in the area and shows that the average transaction at subject firm was approximately \$25.45 while the other competitors with better stock are lower:

Aug2007, Jul2007, Jun2007

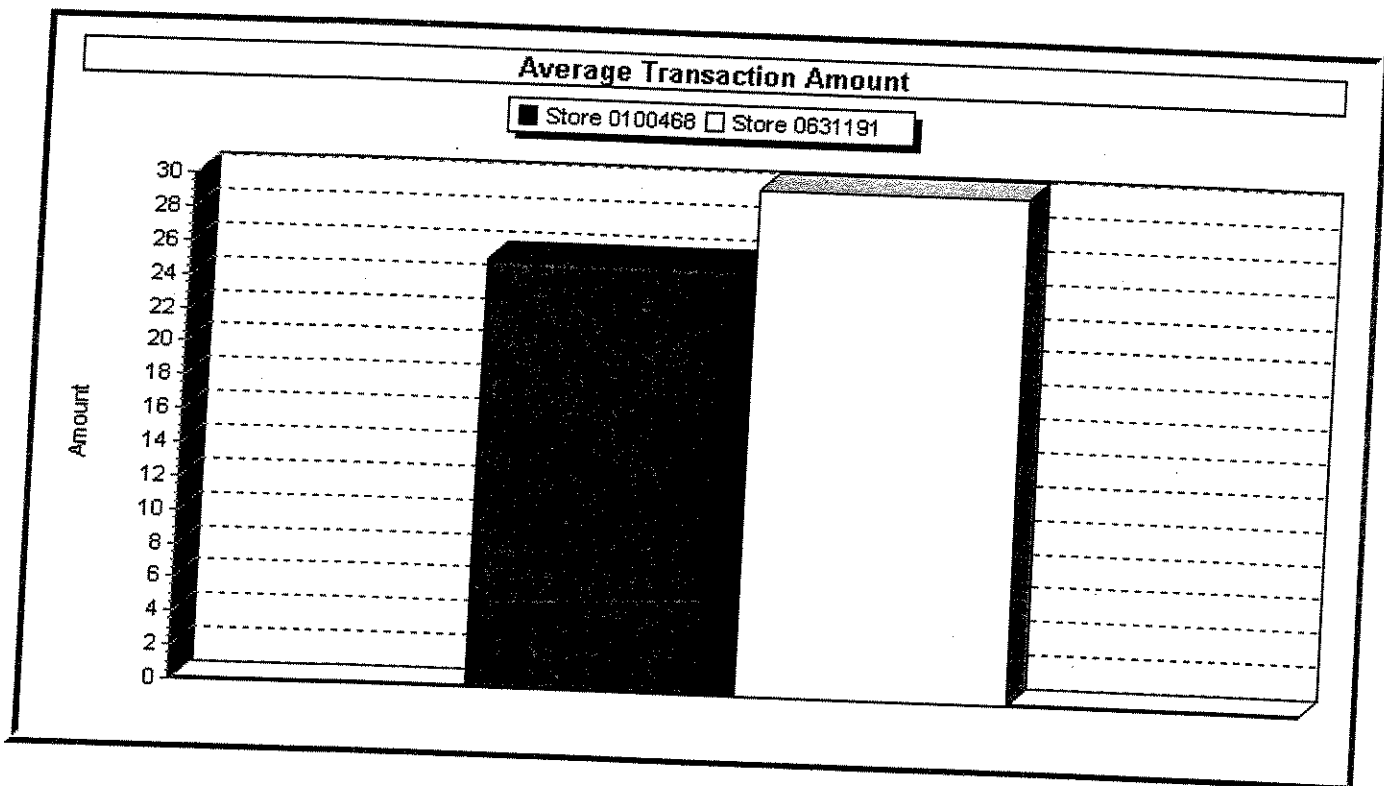
Store ID	Store Name	Store Type	State	Total Trans Count	Total Trans Amount
0100468	Ivana Grocery Store	SG	NY	2320	\$59,060
0084793	PAURIANY #2 DELI GROCERY	SG	NY	2027	\$23,936
0077236	LA RAZA GROCERY & MEAT MARKET L.L	SG	NY	578	\$5,528
5879779	R.J.H. DELI GROCERY	SG	NY	2492	\$17,831
0039649	La Villa Farm of NY Corp				



The chart below compares J D Supermarket's average transaction to Ivana Grocery Store which is a small grocery store. It should be noted that the average transaction amount at the supermarket was slightly higher (\$30.02) than the average transaction at Ivana Grocery Corp (\$25.45) even though the supermarket has 5 cash registers, has baskets and shopping carts, has a large variety of staple food such as a large selection of dairy Products, Fresh meats and poultry, Fresh Fruits and Vegetables and a large selection of bread products and cereals:

Aug2007, Jul2007, Jun2007

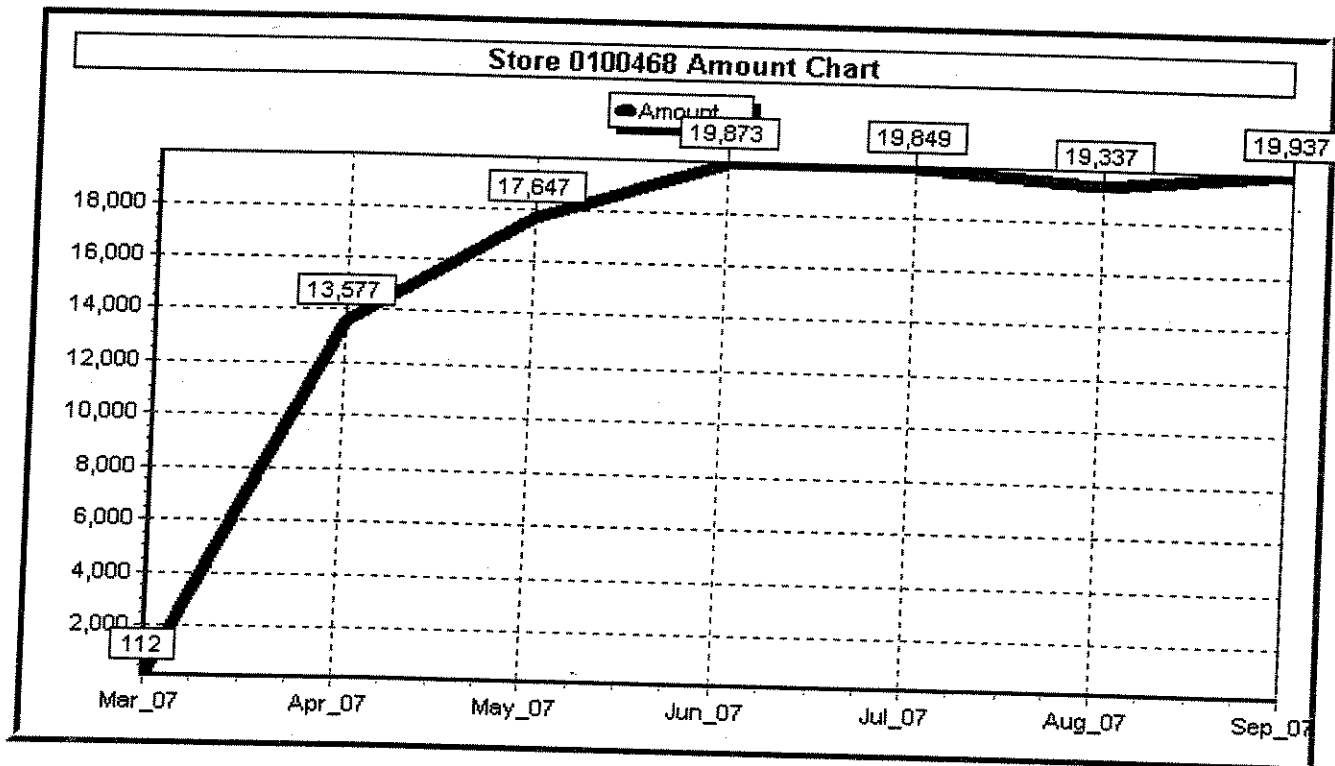
Store ID	Store Name	Store Type	State	Total Trans Count	Total Trans Amount
0100468	Ivana Grocery Store	SG	NY	2320	\$59,060
0631191	J D 248 FOOD CORP	SM	NY	16888	\$507,080



The following graphic clearly shows a disproportionate increase of redemptions at Ivana Grocery Store during the period in question. FNS staffers visited subject store and found no logistic reasons for high redemptions. This store does not sell expensive food items, does not sell fresh meats, poultry or sea food, Ivana Grocery Store does not carries family packs, or sell in bulks. The store has not been renovated or expanded. There are other grocery stores and supermarkets well stocked and authorized to accept food stamps in the area :

March, 2007 - September, 2007

Store ID	Store Name	Type	County	State	Auth Date
0100468	Ivana Grocery Store	SG	BRONX	NY	3/20/2007



Based upon the factors described on this case analysis, a Charge Letter was recommended.

Reply to the Charge Letter

On November 13, 2007, Mr. Franklyn F. Lugo replied in writing to the letter of charges dated November 6, 2007. Mr. Lugo admitted to accepting credit and made specific comments regarding the letter of charges. He also attributed the increased in EBT transactions to newly constructed buildings in the area that accommodate more families. He also mentioned that the excessive amounts of key entered transactions are due to the damaged magnetic strip "that gets messed up making him manually entered the card number." He reiterated that he provided credit because is a custom in the country where he grew up. Mr. Lugo provided statements from his clients in which they admitted buying on credit at Ivana Grocery Store located at 1665 Topping Ave. Bronx New York.

FNS records indicate that many transactions where client cards were key-entered at his location were successfully swiped at the same location on the same day.

Our office received:

- 17 letters from clients to prove that they buy food items on credit at subject firm.

FNS successfully matched:

- 12 clients to the Administrative Terminal that proved the clients did shop at subject store
- One client did not participated during the reviewed period
- We were not able to matched 4 clients in the Administrative Terminal

Client's data was compared and matched to the Administrative database. Mr. Lugo's practice of allowing clients to pay their credit accounts with their EBT cards is a plausible explanation for multiple withdrawals on a short period of time with one or more food stamp clients. It is also a possible explanation for their depletion of balances and excessively large withdrawals from household's food stamp accounts.

After thorough review and analysis of all the data submitted by the retailer, FNS concluded that suspicious transactions could be attributed to credit. However, Mr. Lugo knowingly failed to adhered to the Food Stamp Regulations that states in part "coupons (benefits instruments) may not be accepted by an authorized retail food store in payment for any eligible food sold to household on credit" 278.2(f)

Mr. Lugo attended an orientation class prior to his authorization on March 3, 2007 in which he received a complete review of program regulations. Retailers are instructed to discuss the rules and regulations with all their employees. It is explained to retailers during the orientation that it is essential that regulations governing the program be followed to avoid future sanctions. Credit and trafficking is especially emphasized.

Recommendation:

Mr. Lugo demonstrated a deliberated disregard of the regulations and showed that it is a normal practice to violate the FSP regulations, as opposed to carelessness. Therefore, Section 278.6(e)(4) of the FSP regulations states that a firm is to be disqualified for one year if the ownership or management committed violations such as the sale of common nonfood items

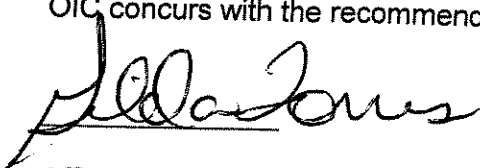
After considering Mr. Lugo's reply, reviewing the clients' letters, and other provided data, we concluded that suspicious transactions could be attributed to the credit practice.

By allowing food stamp recipients to use their benefit instruments to pay for previous purchases for which store credit had been extended, Mr. Lugo engaged in violation of Section.278.2 (f) of the FSP regulations that states in part "coupons (benefits instruments) may not be accepted by an authorized retail food store in payment for any eligible food sold to household on credit". Frank Lugo, Owner of Ivana Grocery Store demonstrated a deliberated disregard of the FSP regulations and showed that is a normal practice to violate the regulations at his store, as opposed to carelessness. This act warrants a sanction as specified by Section 278.6 (e) (4) of the FSP regulations which provides that FNS shall disqualify a firm for one year.

Margarita Cora

Program Specialist

OIC concurs with the recommendation and Determination Letter was issued

A handwritten signature in dark ink, appearing to read "J. Jones", is written over a horizontal line.

Officer in Charge

# BAR GRAPHS



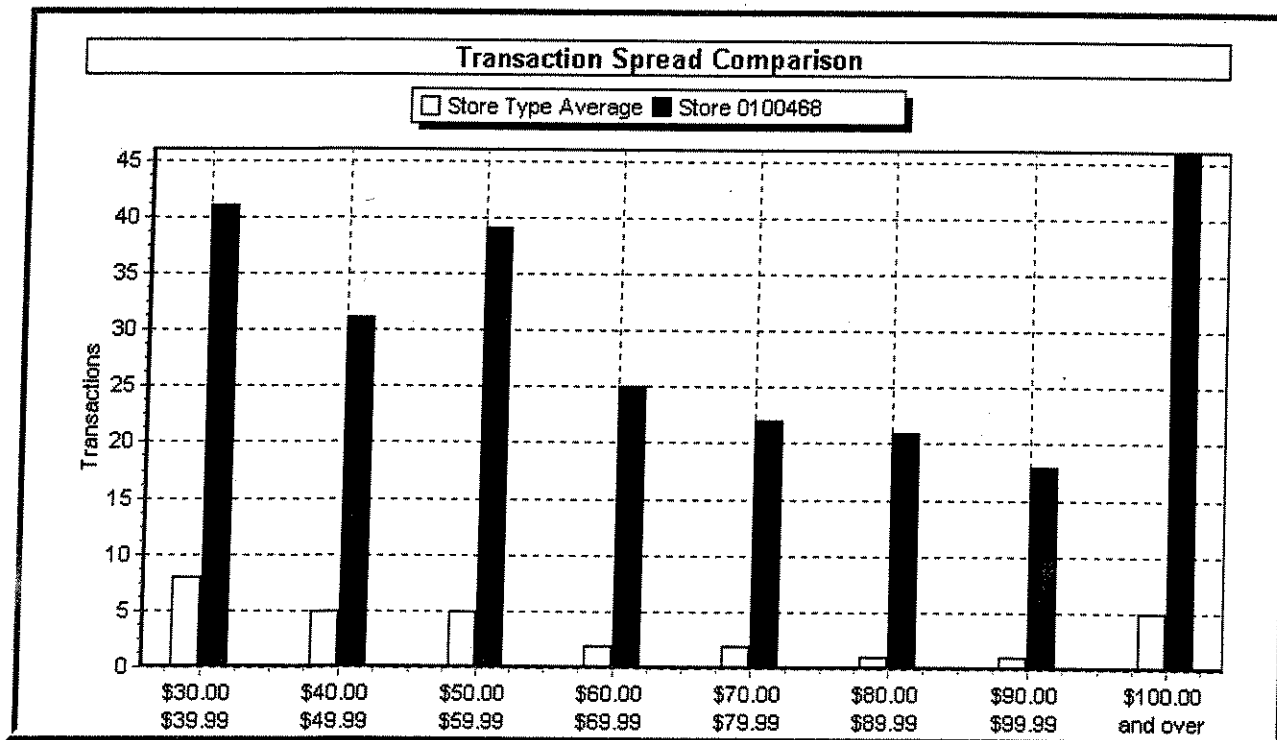
AMRT0007

# ALERT Management Reporting Tool Transaction Spread Comparison Report

9/27/2007  
7:39 am

Months: Jun2007

Store ID	Store Name	Store Type	State	Total Trans Count	Total Trans Amount
0100468	Ivana Grocery Store	SG	NY	768	\$19,873



## Download

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A.R. 143

AMRT0007

# ALERT Management Reporting Tool

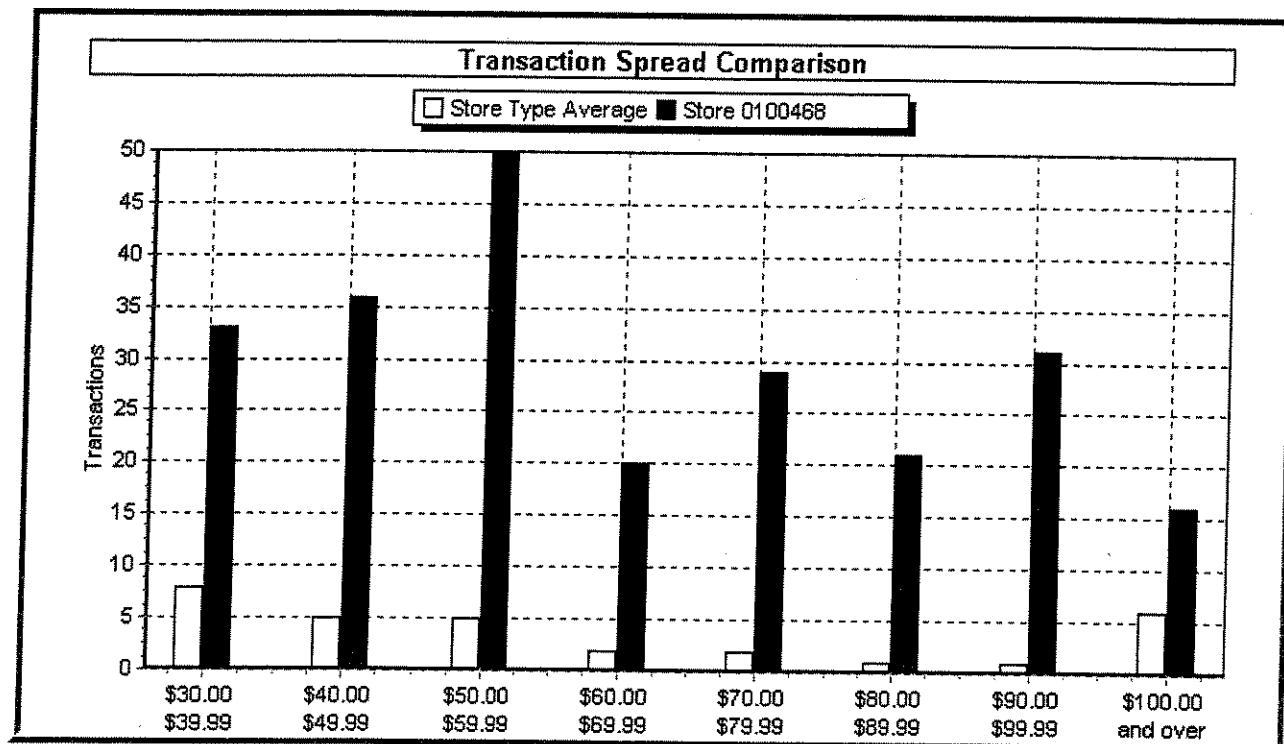
## Transaction Spread Comparison Report

9/27/2007

7:40 am

Months: Jul2007

Store ID	Store Name	Store Type	State	Total Trans Count	Total Trans Amount
0100468	Ivana Grocery Store	SG	NY	796	\$19,849



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A.R. 144

AMRT0007

# ALERT Management Reporting Tool

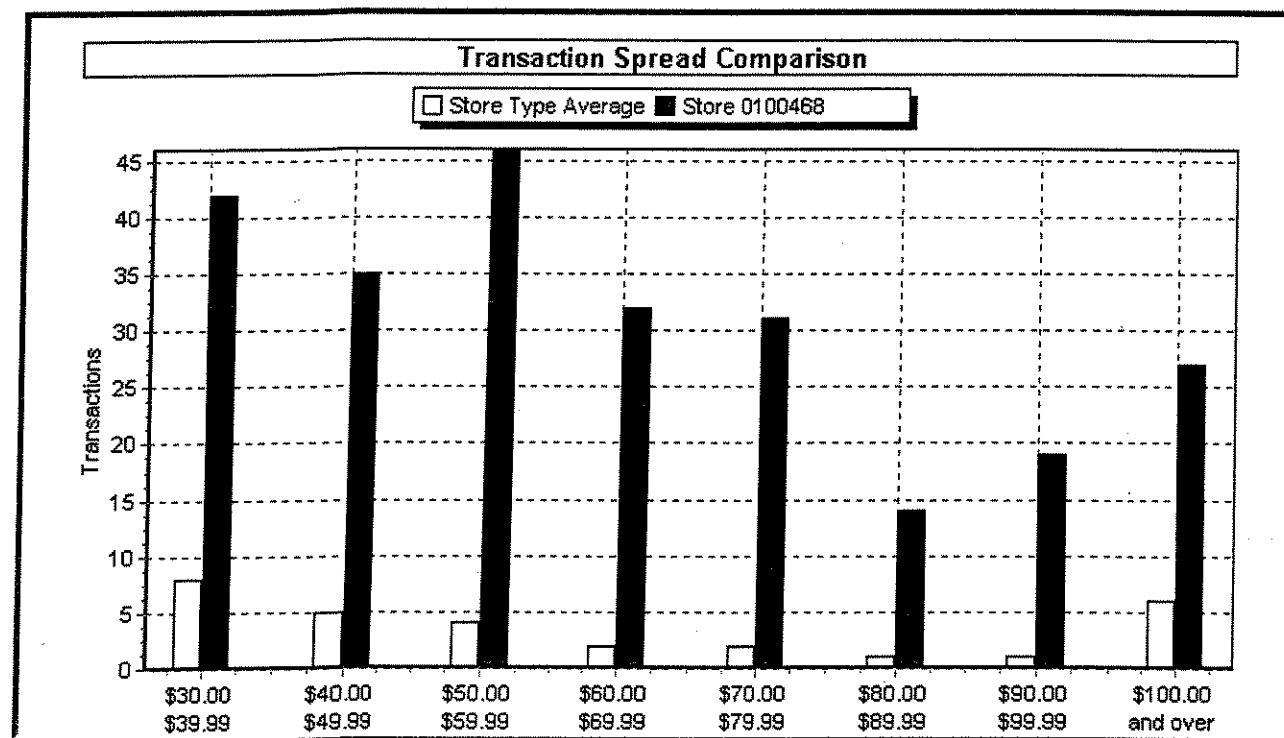
## Transaction Spread Comparison Report

9/27/2007

7:40 am

Months: Aug2007

Store ID	Store Name	Store Type	State	Total Trans Count	Total Trans Amount
0100468	Ivana Grocery Store	SG	NY	756	\$19,337



### Download

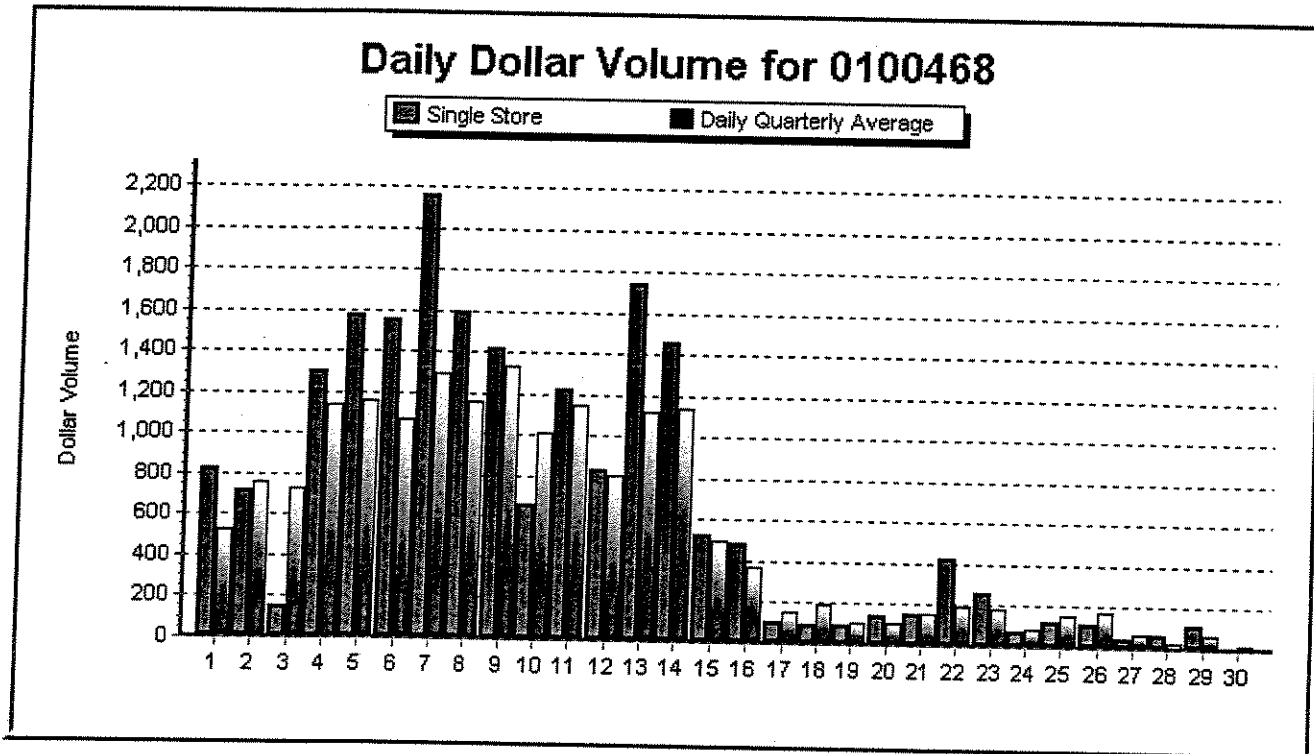
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A.R. 145

**AMRT0006****ALERT Management Reporting Tool  
Daily Dollar Volume Report****09/27/2007  
08:00 AM**

**State:** New York  
**Month:** June, 2007  
**Retailer:** 0100468 Ivana Grocery Store



**Total Dollar Volume** \$19,872.86  
**Number of Transactions** 768

	<u>Date</u>	<u>Amount</u>	<u>Transactions</u>
<b>Most Active Day:</b>	6/7/2007	\$2,154.72	49
<b>Least Active Day:</b>	6/30/2007	\$1.99	1

Download

**Download Tip:** Right click on above Download link to bring up a pop up context menu and then left click on the "Save Target As..." option.

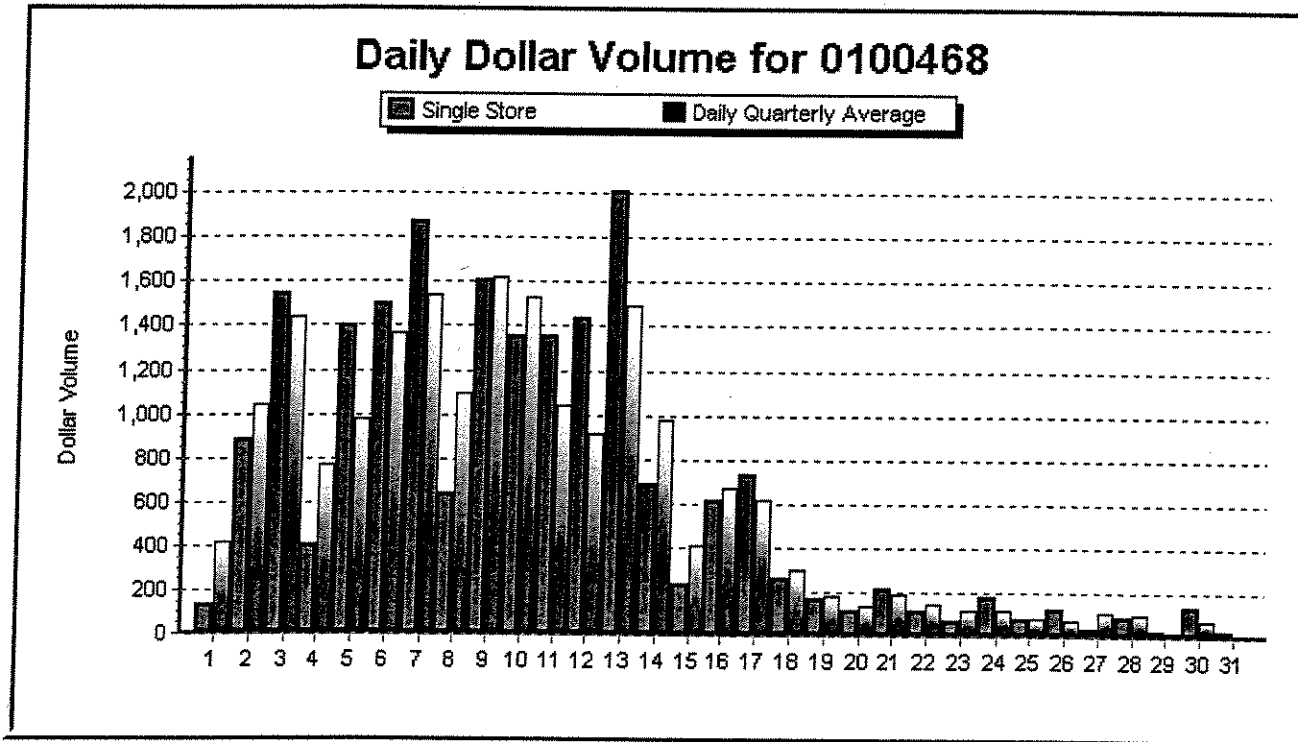
Sensitive and Confidential Information - Disseminate on a Need-To-Know Basis Only

A.R. 146

AMRT0006

**ALERT Management Reporting Tool**  
**Daily Dollar Volume Report**
**09/27/2007**  
**08:00 AM**

**State:** New York  
**Month:** July, 2007  
**Retailer:** 0100468 Ivana Grocery Store



**Total Dollar Volume** \$19,849.44  
**Number of Transactions** 796

	<u>Date</u>	<u>Amount</u>	<u>Transactions</u>
<b>Most Active Day:</b>	7/13/2007	\$2,001.64	55
<b>Least Active Day:</b>	7/31/2007	\$15.33	3

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**Download Tip:** Right click on above Download link to bring up a pop up context menu and then left click on the "Save Target As..." option.

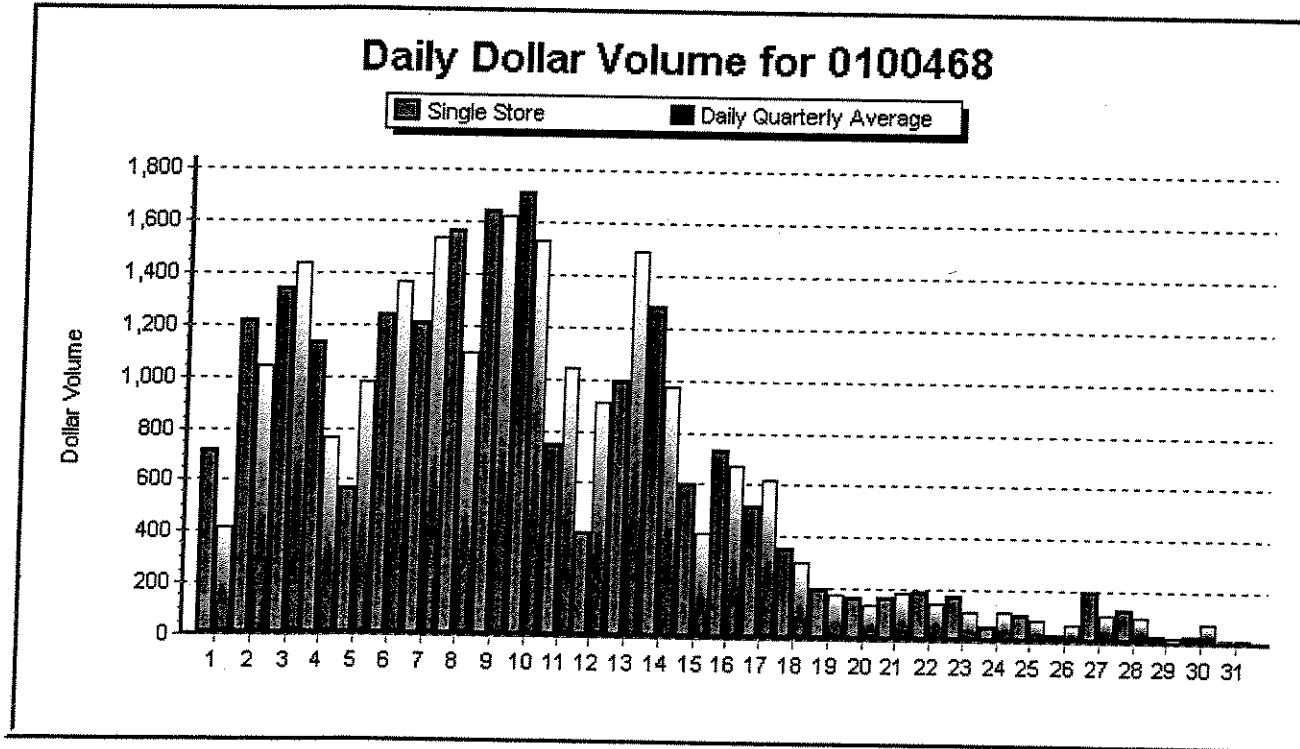
Sensitive and Confidential Information - Disseminate on a Need-To-Know Basis Only

A.R. 147

AMRT0006

**ALERT Management Reporting Tool**  
**Daily Dollar Volume Report**
**09/27/2007**  
**07:58 AM**

**State:** New York  
**Month:** August, 2007  
**Retailer:** 0100468 Ivana Grocery Store



**Total Dollar Volume** \$19,337.21  
**Number of Transactions** 756

	<u>Date</u>	<u>Amount</u>	<u>Transactions</u>
<b>Most Active Day:</b>	8/10/2007	\$1,709.03	55
<b>Least Active Day:</b>	8/31/2007	\$10.49	4

Download


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Sensitive and Confidential Information - Disseminate on a Need-To-Know Basis Only

# **STORE'S REDEMPTIONS**



FNS Number: 0100468

Ivana Grocery Store  
Store Number: NONEStatus:  Authorized  
Status Reason: Initial Authorization  
Status Effective Date: 03/20/2007Corporation Name: NONE  
Corporation Number: NONE  
Centralization Plan Number: NONE

Assigned Field Office: New York, NY

**Redemption Information**

Data Shown for Last Financially Closed 12 Months Estimated totals marked with \*\*

Last Closed Month: 06/2007  
12 Months Cumulative Redemptions:  
\$50,875.48  
AMR: \$14,968.00Tax Year: 2007  
Annual Retail Sales: \$204,000.00 \*\*

Eligible Food Sales: \$183,600.00

Redemption/Food Sales Ratio: 27.71%

**Select Dates for Redemptions:****Credit Date:**

From: 102006

To: 092007

[Revise Summary Dates](#)**Summary Redemptions**

Please note: Redemption adjustments are not specifically identified in the listing below. Use the Redemption Detail screen to determine if there are adjustment records for a given time period.

Month/Year	Amount	Open/Closed	Number of Redemptions	Redemption Type
09/2007	\$18,636.29	Open	30	EBT
08/2007	\$19,227.89	Open	40	EBT
07/2007	\$19,707.37	Open	41	EBT
06/2007	\$19,820.94	Closed	42	EBT
05/2007	\$17,367.74	Closed	34	EBT
04/2007	\$13,686.80	Closed	42	EBT
03/2007	\$0.00	Closed	0	NONE
02/2007	\$0.00	Closed	0	NONE
01/2007	\$0.00	Closed	0	NONE
12/2006	\$0.00	Closed	0	NONE
11/2006	\$0.00	Closed	0	NONE
10/2006	\$0.00	Closed	0	NONE

[STARS](#) | [USDA.gov](#) | [FNS Home](#) | [SFUG](#) |

# **COMPETITORS**

## Your search criteria:

Store Type=Small Grocery Store;  
Status=Authorized; Address  
Type=Location; Zip Code=10457

## Sorting Preferences

Primary: FNS Number

Secondary: Store Name

Stores Found: 69

To choose a store, click the select button

FNS Number: 0018327

## VC Deli Grocery

Store Number: NONE

640 E 180 St

Bronx, New York 10457

County: BRONX

United States of America

Store Status:  Authorized

Status Reason: Initial Authorization

Status Effective Date: 03/03/2005

Corporation Name: NONE

Corporation Number: NONE

Store Type: Small Grocery Store

FNS Number: 0027007

## Pena Deli Grocery

Store Number: NONE

4298 Park Ave

Bronx, New York 10457

County: BRONX

United States of America

Store Status:  Authorized

Status Reason: Initial Authorization

Status Effective Date: 05/05/2005

Corporation Name: NONE

Corporation Number: NONE

Store Type: Small Grocery Store

FNS Number: 0029132

## A Reyes Grocery Corp

Store Number: NONE

1725 Fulton Ave

Bronx, New York 10457

County: BRONX

United States of America

Store Status:  Authorized

Status Reason: Initial Authorization

Status Effective Date: 06/07/2005

Corporation Name: NONE

Corporation Number: NONE

Store Type: Small Grocery Store

FNS Number: 0034326

## 1964 Grand Food Corp

Store Number: NONE

1964 Grand Concourse Ave

Bronx, New York 10457

County: BRONX

United States of America

Store Status:  Authorized

Status Reason: Initial Authorization

Status Effective Date: 07/13/2005

Corporation Name: NONE

Corporation Number: NONE

Store Type: Small Grocery Store

FNS Number: 0037517

## Yorsan Deli &amp; Grocery

Store Number: NONE

2160 Tiebout Ave

Bronx, New York 10457

Store Status:  Authorized

Status Reason: Initial Authorization

Status Effective Date: 09/15/2005

**Your search criteria:**

Store Type=Medium Grocery Store;  
Status=Authorized; Address  
Type=Location; Zip Code=10457

**Sorting Preferences**

Primary: FNS Number

Secondary: Store Name

Sort

**Stores Found: 13**

To choose a store, click the select button

Select

FNS Number: 0032364

**Sahara African/Caribbean Supermarket**

Store Number: NONE

472 E Tremont Ave

Bronx, New York 10457

County: BRONX

United States of America

Store Status:  Authorized

Status Reason: Initial Authorization

Status Effective Date: 06/27/2005

Corporation Name: NONE

Corporation Number: NONE

Store Type: Medium Grocery Store

Select

FNS Number: 0057230

**Lucky 3rd Deli Grocery Inc**

Store Number: NONE

531 E Tremont Ave

Bronx, New York 10457

County: BRONX

United States of America

Store Status:  Authorized

Status Reason: Initial Authorization

Status Effective Date: 01/19/2006

Corporation Name: NONE

Corporation Number: NONE

Store Type: Medium Grocery Store

Select

FNS Number: 0092529

**New York 99c Store Corp**

Store Number: NONE

559-561 E Tremont Ave

Bronx, New York 10457

County: BRONX

United States of America

Store Status:  Authorized

Status Reason: Initial Authorization

Status Effective Date: 12/21/2006

Corporation Name: NONE

Corporation Number: NONE

Store Type: Medium Grocery Store

Select

FNS Number: 0094925

**Kolac Inc**

Store Number: NONE

1960 Bathgate Ave

Bronx, New York 10457

County: BRONX

United States of America

Store Status:  Authorized

Status Reason: Initial Authorization

Status Effective Date: 02/27/2007

Corporation Name: NONE

Corporation Number: NONE

Store Type: Medium Grocery Store

Select

FNS Number: 0102953

**Onstar Distributions Inc**

Store Number: NONE

1971 Webster Ave

Bronx, New York 10457

Store Status:  Authorized

Status Reason: Initial Authorization

Status Effective Date: 04/10/2007

**Your search criteria:**  
 Store Type=Supermarket;  
 Status=Authorized; Address  
 Type=Location; Zip Code=10457

**Sorting Preferences**  
**Primary:** FNS Number  
**Secondary:** Store Name

Sort

Stores Found: 4


To choose a store, click the select button

Select

FNS Number: 0253464

**B J FOOD CORP**

Store Number: NONE  
 309 E BURNSIDE AVE  
 BRONX, New York 10457  
 County: BRONX  
 United States of America

Store Status:  Authorized  
 Status Reason: Initial Authorization  
 Status Effective Date: 11/13/1984

Corporation Name: B J FOOD CORP  
 Corporation Number: CN-0006096

Store Type: Supermarket

Select

FNS Number: 0631191

**J D 248 FOOD CORP**

Store Number: NONE  
 248 E 174TH ST  
 BRONX, New York 10457  
 County: BRONX  
 United States of America

Store Status:  Authorized  
 Status Reason: Initial Authorization  
 Status Effective Date: 06/09/1992

Corporation Name: J D 248 FOOD CORP  
 Corporation Number: CN-0014609


Store Type: Supermarket

Select

FNS Number: 3544931

**TREMONT MEAT CORP**

Store Number: NONE  
 229 E TREMONT AVE  
 BRONX, New York 10457  
 County: BRONX  
 United States of America

Store Status:  Authorized  
 Status Reason: Initial Authorization  
 Status Effective Date: 12/10/1998

Corporation Name: TREMONT MEAT CORP  
 Corporation Number: CN-0085565


Store Type: Supermarket

Select

FNS Number: 3761967

**2096 CONCOURSE FOOD CORP**

Store Number: NONE  
 2096 GRAND CONCOURSE  
 BRONX, New York 10457  
 County: BRONX  
 United States of America

Store Status:  Authorized  
 Status Reason: Initial Authorization  
 Status Effective Date: 05/25/1999

Corporation Name: 2096 CONCOURSE FOOD CORP  
 Corporation Number: CN-0091365

Store Type: Supermarket

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 [Page ID: S\_596]

## Your search criteria:

Store Type=Super Store;  
Status=Authorized; Address  
Type=Location; Zip Code=10457

## Sorting Preferences

Primary: FNS Number

Secondary: Store Name

Stores Found: 2

---


To choose a store, click the select button

FNS Number: 1060503

---

WESTERN BEEF RETAIL, INC

Store Number: 30  
4269 PARK AVE  
BRONX, New York 10457  
County: BRONX  
United States of America

Store Status:  Authorized  
Status Reason: Initial Authorization  
Status Effective Date: 02/10/1992

Corporation Name: WESTERN BEEF INC  
Corporation Number: CN-0024482

Store Type: Super Store

FNS Number: 3398374

---

C & R FOOD CORP

Store Number: NONE  
708 E TREMONT AVE  
BRONX, New York 10457  
County: BRONX  
United States of America

Store Status:  Authorized  
Status Reason: Initial Authorization  
Status Effective Date: 08/14/1998

Corporation Name: C & R FOOD CORP  
Corporation Number: CN-0081589

Store Type: Super Store

---

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[Page ID: S\_596]

# **CASE CHARACTERISTICS**



**Recommendation Form****Store Name** *Ivana Grocery Corp***Date** *October 1, 2007***Authorization #** *0100468*(1) ☒ **Paper Case - Charge Letter**(2) ☐ **RFI is recommended based on the following:**(3) ☐ **No Further Action (NFA) is recommended based on the following:**

Firms designated as requiring no further action are moved to a closed status on the Watch List and may receive a re-review period by default. Re-review period is the length of time until a firm may reappear on the Watch List if it meets the criteria to qualify as a "Pending" store on the Watch List. Users may manually alter these periods to a shorter time frame, but are prohibited from lengthening them. NFA suspense periods for each category are stated below.

**A. Explainable**

Users shall use this designation if research, which can include a store visit, owner provided information, invoice documents, etc., establishes that the electronic transaction patterns are explainable and consistent with the documented description of a store's unique practices. *Watch List will assign a 1 year default suspense period.*

☐ Assign default suspense☐ Assign alternative abbreviated suspense of: \_\_\_\_\_**B. Business Practices are Legitimate**

Users shall use this designation if only limited analysis is necessary and is able to determine that the pattern is consistent with the particular marketing practice of this type of firm. An example would be a dollar store that is known to charge in even cents values and only hits the repeated cents value scan (Scan A). The difference between "Explainable" and "Legitimate Business Practice" is that one would expect the particular scan result for a particular "sub-grouping" of this firm type. In time, with improved store information and analytic tools, ALERT should be able to recognize and not pend the store in the first place. *Watch List will assign a 2 year default suspense period.*

☐ Assign default suspense☐ Assign alternative abbreviated suspense of: \_\_\_\_\_**C. Miscoded**


Users shall use this designation if a firm met Watch List eligibility requirements, as described in Section 282, solely as the result of an inaccurate store type in STARS. For example, supermarkets are excluded from the Watch List Pending List. A supermarket miscoded as a medium or small grocery store would needlessly appear on the Watch List. Do not use this designation unless STARS has first been updated with the correct store type.

*There is no default suspense assigned.*(4) ☐ **Other**(5) ☐ **Store is Closed**☐ **Change of Ownership**

**Comments:** Subject firm was visited on 10/1/07. This is a small store with moderate variety and moderate selection of staple food. Observed suspicious signals with clients such as eye movements & body language. Based on visual inspection, stock cannot justify the transactions, neither the average redemption amount of \$14, 968. Charge Letter is recommended.

**Recommended by** *Margarita Cora***Date** *10/1/07***Verified By** *[Signature]* **Date** *11/2/07*

10.0	▼ 0100468	Ivana Grocery Store	Small Grocery Store	Analysis 103	New York BRONX	NONE	No
------	-----------	---------------------	---------------------	--------------	----------------	------	----

**Store Status:**  Authorized  
**Status Reason:** Initial Authorization  
**Status Effective Date:** 03/20/2007  
**Watch List SubCategory:** NONE  
**NFA Reason:** NONE  
**ALERT Scores for the Month of:** 8/2007

**Street Address:** 1665 Topping Ave  
**Annual Retail Sales:** \$ 204,000.00  
**Eligible Food Sales:** \$ 183,600.00  
**Number Of Registers:** 1  
**Transaction Count:** 756

**Monthly ALERT Dollar Volume:**

3/2007: \$ 112.32  
 4/2007: \$ 13,577.48  
 5/2007: \$ 17,646.66  
 6/2007: \$ 19,872.86  
 7/2007: \$ 19,849.44  
 8/2007: \$ 19,337.21

Scan A: 0  
 Scan B1: 22  
 Scan C: 9  
 Scan D: 115  
 Scan F: 56  
 Scan G%: 0.13

Scan A%: 0.0  
 Scan B2: 22  
 Scan D%: 0.15  
 Scan F%: 0.07

**Dollar Volume Total:** \$ 90,395.97  
**Dollar Volume Average:** \$ 15,066.00

# **SITE VISIT**



Authorization Number: 0100468

Phone Number:

(718) 466-4935

Store Name: Ivana Grocery Store

Address: 1665 Topping Ave Bronx, NY 10457

Person Interviewed: Xiomara Guzman

Position / Title: Manager

Store Owner(s) Name(s): Franklyn F. Lugo

Store Type: SG - Small Grocery Store

Date of Visit: 10/1/2007 Time began: 03:07 PM Time ended: 03:26 PM

Questions 1 through 12 below: Observe, review, and confirm findings with the store owner, manager, or clerk. If FNS observations, and those of the owner, manager, or clerk are not in concurrence, an explanation MUST be provided under the "comments" section of this article.

Observe and Review/Confirm:

1. Days of Operation:	Sunday	Hours: 7:00AM-12/1AM	<input type="checkbox"/> Reviewed <input checked="" type="checkbox"/> Confirmed
	Monday	Hours: 7:00AM-12/1AM	
	Tuesday	Hours: 7:00AM-12/1AM	
	Wednesday	Hours: 7:00AM-12/1AM	
	Thursday	Hours: 7:00AM-12/1AM	
	Friday	Hours: 7:00AM-12/1AM	
	Saturday	Hours: 7:00AM-12/1AM	
2. Night window:	<u>None</u>	Hours: 0	<input type="checkbox"/> Reviewed <input checked="" type="checkbox"/> Confirmed
3. Working registers:	<u>Yes</u>	Quantity: 1	<input type="checkbox"/> Reviewed <input checked="" type="checkbox"/> Confirmed
4. Adding machines/calculators:	<u>Yes</u>	Quantity: 2	<input type="checkbox"/> Reviewed <input checked="" type="checkbox"/> Confirmed
5. Scanners:	<u>None</u>	Quantity: 0	<input type="checkbox"/> Reviewed <input checked="" type="checkbox"/> Confirmed
6. EBT-only POS machines:	<u>Yes</u>	Quantity: 1	<input type="checkbox"/> Reviewed <input checked="" type="checkbox"/> Confirmed
7. Commercial POS machines:	<u>None</u>	Quantity: 0	<input type="checkbox"/> Reviewed <input checked="" type="checkbox"/> Confirmed
8. Commercial POS machines that handle EBT transactions:	<u>None</u>	Quantity: 0	<input type="checkbox"/> Reviewed <input checked="" type="checkbox"/> Confirmed
9. Shopping carts?	<u>None</u>	Quantity: 0	<input type="checkbox"/> Reviewed <input checked="" type="checkbox"/> Confirmed
10. Shopping baskets or crates?	<u>None</u>	Quantity: 0	<input type="checkbox"/> Reviewed <input checked="" type="checkbox"/> Confirmed
11. Other food storage locations?	<u>Yes</u>	Location: <u>Basement</u>	<input type="checkbox"/> Reviewed <input checked="" type="checkbox"/> Confirmed
12. Promotional, special or package items available?	<u>None</u>	Attached: <u>None</u>	<input type="checkbox"/> Reviewed <input checked="" type="checkbox"/> Confirmed

A.R. 160

Questions 13 through 21 are based on information provided by the store owner, manager, or clerk at the time of the store visit.  
Do not include infant formulas in this section.

13. Three (3) most expensive eligible items:

Item 1:	Gallon of cooking oil	Size: 1	gal	Price: \$	9.99
Item 2:	Box of Cold Dry Cereal	Size: 1	ea	Price: \$	5.69
Item 3:	Canned Planters Peanuts	Size: 1	ea	Price: \$	4.89

14. Store employees working during its busiest time: Quantity: 2

15. Participates in the WIC Program? No

16. Credit extended to food stamp customers? No

17. Totals rounded-off for food stamp customers? No

18. Is a Home Food Delivery Service provided to food stamp customers? Yes

18a. How is the food delivery transported? Transported by: On Foot

18b. Food delivery radius from store: Less than 1/4 Mile

18c. What is the minimum delivery order price? \$ 0.00

19. Is Phone Order Service provided to customers? No

20. Store renovations or expansions? None

20a. Date of renovation or expansion?

21. Problems with EBT machine: No

Items 22 through 32 below are based upon FNS observations.

22. Number of store entrances? 1 23. Parking? Street parking only

24. Public transportation? Store located on bus route

25. Store type correct? Yes Correct Store Code? No

26. Describe the counter(s): Counter Space Dimensions: 3' X 2'

27. The counter was uncluttered, approximately 3' x 2'.

28. The open counter was not equipped with conveyor belt or optical scanners to expedite transactions

29. Describe area behind the check-out counter(s):

30. Limited space, approximately 3' by 7'. Observed ineligible items on shelves against the wall, boxes on the floor, bags, cartons and large plastic container (45 gallons size) full of garbage.

31. Condition of store stock/food products:

32. The store had no fresh meats, poultry or fish. The variety fresh fruits and vegetables were also limited.

33. The deli case had limited cold cuts. Observed 1 1/2 salami, half a block of cheese, two packs of beacon, two packs of hotknifurters; one pack of pre-pack cod fish, one pack of margarine, turkey and ham. The deli case also had a tomatoe, dry beans and 20 small apples.

34. Found expired Barley baby cereal (8 boxes). Told manager to check the store stock and immediately remove all the expired items. I made her aware of the expired baby cereal and also recommended to remove the price tags from all the baby food items because the tags were covering the expiration day.

35. Observed some dusty canned goods.

36. Are prices marked? Yes 37. Do most items end in the same cents? No Ending cents: variety of 9  
38. Does retailer sell infant formula? Yes A.R. 161

Other:

Enfamil Lipil with Iron a blend of DHA & ARA Concentrated

Quantity: 8 Price \$ 5.49 per Can

32. EBT transactions observed during visit: No

32a. Compare your observations with the administrative terminal for time of visit: Transactions identical

32b. *If the administrative terminal shows any transactions, print and attach the page to this survey form.*

None

33. Comments:

# 2. the small 2' by 2' window was sealed and not in use.

# 11. As per manager, the only thing in the basement was a walk-in refrigerator with milk.

# 18. Free delivery done sporadically on foot, only two blocks away from the store.

The size of this store is approximately 17' by 35' and has three narrow aisles.

Margarita Cora & Joseph Tartaglia

NS Program Specialist

Margarita Cora  
Signature

10/1/2007

Date

RJSDJI

New York EBT Production System  
Detail Journal Inquiry

10/23/07

08:22:58

FCS #: 0100468DATE: 10012007

----- Transaction Information -----										
Sel	Date	Time	Type	Trn	Ant	Cmp	Ant	Card Number	Auth id	AFSC
—	10/01/07	10:26	1,0	102.52	102.52			6004868127342839113	040461	YNNNS
—	10/01/07	11:05	1,0	2.50	2.50			6004868818261392304	A44120	YNNK
—	10/01/07	11:34	1,0	20.00	20.00			6004868128253993816	A50335	YNNNS
—	10/01/07	11:40	1,0	60.09	60.09			6004868927181563207	055410	YNNK
—	10/01/07	12:53	1,0	11.00	11.00			6004868931263116306	072020	YNNK
—	10/01/07	12:55	1,0	90.69	90.69			6004868124269711524	072426	YNNK
—	10/01/07	14:00	1,0	15.25	15.25			6004868936158212417	086863	YNNNS
—	10/01/07	14:34	1,0	29.36	29.36			6004868128233430517	094013	YNNK
—	10/01/07	15:31	1,0	101.20	101.20			6004868121195425526	106495	YNNK
—	10/01/07	16:08	1,0	1.00	1.00			6004868127255830018	114856	YNNNS
—	10/01/07	19:28	1,0	2.20	2.20			6004868127101593315	B55547	YNNNS
—	10/01/07	19:33	1,0	9.75	9.75			6004868125193260421	160239	YNNK

=====

F4-Read F6-Read Next SF4-Transaction Detail

*Wona*  
*Visit conducted*  
*from 3:07 to 3:26 PM*



**APPLICATION  
AND  
ORIENTATION  
FORM**



# Retailer's Acknowledgement and Statement

United States  
Department of  
Agriculture

Food and  
Nutrition  
Service

Northeast Region  
New York City  
Field Office

Store Name: Ivana Grocery Store  
Store Address: 1665 Topping Ave  
Bronx, NY 10457  
Owner's Name: Frankly Lugo, Owner

Translator Needed ☒ Yes ☐ No

00

The following Food Stamp Program (FSP) Materials have been furnished to the retailer:

1. Food Stamp Permit (Form FNS - 254)
2. Food Stamp Program Regulations (PA - 90, Compilation)
3. "We Accept Food Stamp Benefits" (FNS - 132, Poster)
4. "We Accept Food Stamp Benefits" (FNS - 132, Window Sticker)
5. "Report Abuse of the Food Stamp Program" (FNS - 240, Notice)
6. "Using Food Stamp Benefits" (FNS - 110, Poster)
7. "Do's and Don'ts for Cashier/Penalties for Violation of the FSP" (FNS-136, Double-sided sign)
8. National Retailer Training Video and/or CD and the New Retailer Guide (FNS - 330-VHS and FNS - 330 Guide) or (FNS - 330 - CD and FNS - 330 Guide)
9. "Food Stamps Make America Stronger" FNS - 313
10. Officer-in-Charge Approval Letter

I have received the above named Food Stamp Materials including the FSP Retailer VHS Training Video and/or FSP CD-ROM. I have viewed the Video VHS tape and/or CD ROM disc and examined the FS materials and completely understand that I am responsible for the overall operation of the Food Stamp Program in the store and proper training of all personnel in the business.

Franklyn Lugo  
Owner's Name (Please Print)

BENJAMIN HUZUAN  
Translator/Representative's Name (Please Print)

[Signature]  
Owner's Signature

[Signature]  
Translator's/Representative's Signature

Orientation Trainer:

Date:

3/22/2007

OMB Burden Statement: According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-0008. The time required to complete this information collection is estimated to average 15.04 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. If you have comments regarding the accuracy of the time estimate(s) or suggestions for improving this form, please write to: BRD/FNS, Room 400, 3101 Park Center Drive, Alexandria, VA 22302. DO NOT MAIL APPLICATION TO THIS ADDRESS.

**USDA - FOOD STAMP APPLICATION FOR STORES**

Form Approved  
OMB No 0584-0008  
Expiration Date 03/09

Date Authorized			FOR FNS USE ONLY			County Code		Authorization	
MM	DD	YYYY	FNS Number				A/B	Initials	
03	20	2007	0100468			005	A	DJ	

FNS Tracking Number

SUBMIT APPLICATION TO FIELD OFFICE SHOWN ON  
COVER LETTER.

RECEIVED FEB 26 2007

The purpose of the Food Stamp Program is to promote nutrition and health among low-income people. The USDA seeks to operate the Food Stamp Program through retail grocery stores that consistently stock a variety of staple foods in each of the four food groups or who do 50% or more of their gross sales in staple foods. Please answer each of the following items completely and accurately so we may determine your store's eligibility to accept food stamp benefits.

SEE EXAMPLE BELOW: Please use a pen, not a pencil.

Write like this:

A R T ' S M A R K E T

Shade circles like this: ●  
Not like this: ○

**BASIC STORE INFORMATION**

## 1. Store Name

IVANA GROCERY STORE

## 2. Store Location Address (Do Not Use Post Office Box)

Street Number Street Name

1665 TOPPING AVENUE

City

State

Zip Code

BRONX NY 10457 -

County

BRONX

## 3. Store Mailing Address (Do not complete if the same as #2 above)

Street Number Street Name (or Post Office Box)

City

State

Zip Code

## 4. Telephone Number

Fax Number (If applicable)

718 466-4935

Alternate Phone Number

718 889-3655 Accountant

E-Mail address:

(If applicable)

#(917) 569-3253

5. Shade the box that best describes your store:

- ☐ Supermarket      ☐ Delivery Route      ☐ Drug Store  
☒ Grocery Store      ☐ Farmers Market/Produce Stand      ☐ Super Store  
☐ Convenience Store      ☐ Other (describe): \_\_\_\_\_

6. Federal Employer Identification Number (EIN)  
(If applicable)

An EIN is a nine-digit number assigned by the Internal Revenue Service (IRS). The IRS uses the number to identify businesses that are required to file certain Federal tax returns.

### OWNERSHIP INFORMATION

7. Type of Ownership - Shade one type:

- ☒ Sole Proprietorship      ☐ Limited Liability Company      ☐ Government-owned  
 (If you shade this item, skip to #10)  
☐ Partnership      ☐ Cooperative      ☐ Limited Liability Partnership  
☐ Privately-held corporation      ☐ Publicly-owned corporation (If you shade this item, skip to #9)

8. a. Enter primary owner(s) or major shareholder(s) if the store is owned by one or more people or a private corporation. In community property States, the spouse's information must be entered. Community property states are: Arizona, California, Idaho, Louisiana, Nevada, New Mexico, Texas, the state of Washington and Wisconsin. Enter officer's information if the store is owned by a cooperative. Print name as it appears on the social security card.

First Name: FRANKLYN  
 Middle Name: F  
 Last Name: LUGO *WLOK*

Street Number: 322      Street Name (or Post Office Box): EAST 173rd STREET APT 1C  
 City: BRONX      State: NY      Zip Code: 10457-

Title: OWNER

Social Security Number

Date of Birth: MM/DD/YYYY

b. Enter other owners/shareholders or officer information (If any):

First Name																Middle Name															
Last Name																															
Street Number									Street Name (or Post Office Box)																						
City																State			Zip Code												
Title																															
Social Security Number																									Date of Birth: MM/DD/YYYY						

NOTE: If there are more owners, shareholders or officers, enter the same information above on the Attachment on page 5.

9. Is this store a franchise? ☐ Yes ☒ No

10. Enter name and address of parent corporation or franchise (If applicable):

Name																															
Street Number									Street Name (or Post Office Box)																						
City																State			Zip Code												
Telephone Number																									Fax Number (If applicable)						
E-Mail address: (If applicable)																															

11. When did or when will the store open for business under this ownership? M M D D Y Y Y Y  
09 / 08 / 200712. a. Will this store be open year round? ☒ Yes, (If yes, skip to #12c.) ☐ No

b. If no, shade all months you will be open:

☐ Jan ☐ Feb ☐ Mar ☐ Apr ☐ May ☐ Jun ☐ Jul ☐ Aug ☐ Sept ☐ Oct ☐ Nov ☐ Decc. Will this store be open 7 days, 24 hours? ☐ Yes, (If yes, skip to #12e.) ☒ No

d. Print your store hours and days of operation:

7:00 to 12:00 Mon to Sun

Shade Days Closed: ☐ Mon ☐ Tues ☐ Wed ☐ Thu ☐ Fri ☐ Sat ☐ Sun

e. How many cash registers do you have? 001







18. (Continued): If you answered "yes", please provide an explanation:

n/a

19. (Continued): If you answered "yes", please provide an explanation:

n/a

**Privacy Act Statement** - Section 9 of the Food Stamp Act of 1977, as amended, (Title 7 U.S.C. 2011 et seq.) authorizes collection of this information. The primary use of this information is for the Food Stamp Program. Additional disclosures of the information may be made to other FNS programs within Federal, State or local offices and investigative authorities, including local law enforcement agencies, when the Food Stamp Program becomes aware of a violation or possible violation of the Food Stamp Act, as explained in the next section of this document called "Use and Disclosure" [Title 7 U.S.C. 2018(c) Title 26 U.S.C. 6109(f), Title 42 U.S.C. 405(c) and Title U.S.C. 770119].

Where the owners' identification number is your Social Security Number (SSN), collection of this information is authorized by Section 271.1(b) of program regulations. Under this Section, we are also allowed to collect your Employee Identification Number (EIN) and tax information. We can only share SSNs and EINs with other Federal agencies which are allowed by law to have these numbers in their own records [Title 26 U.S.C. 7213 and Title U.S.C. 20189c]. Furnishing the information on this form, including your SSN and EIN, is voluntary, but failure to do so may result in disapproval of this application.

If FNS or the Food Stamp Program uses the information furnished on this form for purposes other than those indicated on the form, it may provide you with an additional statement reflecting those purposes.

**Use and Disclosure** - We may use computers to check this information you give us against the information kept by other Federal agencies to ensure that the information you gave us is true, including SSNs and EINs. We will use the information you give us for managing and enforcing the food stamp laws and rules. We can share SSNs and EINs with the Department of Justice for lawsuits and with the Treasury Department or other Federal agencies for reporting and collecting monies owed to us, including taking what you owe us out of a future Federal tax refund, Federal salary, or Federal benefit you may receive (7 U.S.C. 2022 and 31 U.S.C. 3711). The information you give us (except SSNs and EINs) can also be shared with: (1) private collection agencies for collecting monies owed to us; (2) with local police and Federal and State agencies responsible for enforcing the Food Stamp Act or any other Federal and State laws and rules; (3) State agencies responsible for the Special Supplemental Nutrition Program for Woman, Infants and Children (WIC).

**Penalty Warning Statement** - We can turn down or take away our approval for you to take food stamp benefits as payment for food sold in your store if you: (1) lie or give us untrue information; or (2) try to hide information we ask you to give us. If you lie, give us untrue information, or hide information from us, you and the people who own the store, can be made to pay \$10,000 or be put in jail for as long as five years or both (7 U.S.C. 2024 and 18 U.S.C. 1001).

**Certification and Signature** - By signing your name on this application, you are telling us that: (1) you are the store owner or that the store owner(s) have asked you to apply for them; (2) the information you and/or the owner(s) gave us on this form, or papers we asked for, is true; (3) you read and understand all the information on this sheet; (4) you cannot treat food stamp customers differently than other customers; (5) you understand that you and the person(s) for whom you are applying are responsible for stopping workers, paid or unpaid, from breaking food stamp rules such as, but not limited to: (a) trading cash for food stamp benefits; (b) taking food stamp benefits from people not allowed to use them; (c) taking food stamp benefits to pay on a credit account or loan; (d) taking food stamp benefits to pay for items not allowed to be paid for with food stamp benefits. We can take away a store's right to take food stamp benefits as payment for food sold in your store if any owner(s), manager(s), or anyone working in the store violates any of the food stamp law or rules.

## AGREEMENT

## I UNDERSTAND AND AGREE:

- I have authority to contract for the firm.
- I have provided truthful and complete information on this form.
- I hereby agree to release to the Department of Agriculture (USDA), by my signature below, my tax records and also to allow USDA to verify the accuracy of information submitted with this application.
- Any information I provide may be verified and shared by/with other agencies as described on the attachment.
- If I provide false information, my application may be denied or withdrawn.
- I accept responsibility to report changes in the firm's ownership, address, type of business, and operation to the FNS Field Office.
- I will follow, and ensure employees will follow, the Food Stamp Program regulations. I am aware that violations of program rules can result in fines, legal sanctions, withdrawal, or disqualification from the Food Stamp Program.
- I accept responsibility on behalf of the firm for violations of the Food Stamp Program regulations, including those committed by any of the firm's employees, both paid or unpaid, new, full-time or part-time. These include violations, such as but not limited to:
  - Treating food stamp customers differently than other customers
  - Trading cash for food stamp benefits
  - Knowingly accepting food stamp benefits from people not authorized to use them
  - Accepting food stamp benefits as payments on credit accounts or loans
  - Accepting food stamp benefits as payments for ineligible items
- Participation can be denied or withdrawn if my firm violates any laws or regulations issued by Federal, State, or local agencies, including civil rights laws and their implementing regulation. In addition, disqualification from the WIC Program may result in Food Stamp Program disqualification.
- Participation in the Food Stamp Program requires that I will not discriminate against any customer on the grounds of race, color, national origin, age, sex, handicap (disability), political belief or religion; and that I will immediately take any measures necessary to make sure that my customers are not discriminated against.
- Any individual or firm accepting or redeeming food stamp benefits, if not authorized to do so, is subject to substantial fines and administrative sanctions.
- I have read and understand the Privacy Act Statement, Warnings, and Certification as provided.

X

Signature

Date Signed

Print Name

Print Title

In accordance with Federal Law and U.S. Department of Agriculture policy, your institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, religion, political beliefs or disability.

To file a complaint of Discrimination, write:

USDA, Director, Office of Civil Rights  
Room 326W, Whitten Building  
1400 Independence Avenue, SW.  
Washington, D.C. 20250-9410

DO NOT MAIL APPLICATION TO THIS ADDRESS: ►

JUDGE SULLIVAN

AO 440 (Rev. 8/01) Summons in a Civil Action

UNITED STATES DISTRICT COURT

Southern

District of

New York

FRANKLYN F. LUGO

SUMMONS IN A CIVIL ACTION

V.

UNITED STATES DEPARTMENT OF  
AGRICULTURE, FOOD AND CONSUMER  
SERVICE

08 CV 02960  
CASE NUMBER:

TO: (Name and address of Defendant)

UNITED STATES ATTORNEY'S OFFICE  
SOUTHERN DISTRICT OF NEW YORK  
1 ST. ANDREWS PLAZA  
NEW YORK, NEW YORK 10007

YOU ARE HEREBY SUMMONED and required to serve on PLAINTIFF'S ATTORNEY (name and address)

CODELIA & SOCORRO, P.C.  
1967 TURNBULL AVENUE - SUITE #6  
BRONX, NEW YORK 10473

an answer to the complaint which is served on you with this summons, within 20 days after service of this summons on you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Any answer that you serve on the parties to this action must be filed with the Clerk of this Court within a reasonable period of time after service.

J. MICHAEL McMAHON

MAR 21 2008

CLERK

DATE

(By) DEPUTY CLERK



AO 440 (Rev. 8/01) Summons in a Civil Action

RETURN OF SERVICE		
Service of the Summons and complaint was made by me <sup>(1)</sup>	DATE	
NAME OF SERVER (PRINT)	TITLE	
<i>Check one box below to indicate appropriate method of service</i>		
<input type="checkbox"/> Served personally upon the defendant. Place where served:  <input type="checkbox"/> Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein. Name of person with whom the summons and complaint were left:  <input type="checkbox"/> Returned unexecuted:  <input type="checkbox"/> Other (specify):		
STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL \$0.00
DECLARATION OF SERVER		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.</p> <p>Executed on _____ Date _____ Signature of Server _____</p> <p style="text-align: center;">_____ Address of Server</p>		

(1) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
FRANKLYN F. LUGO,

Plaintiff,

- against -

UNITED STATES DEPARTMENT OF  
AGRICULTURE, FOOD AND CONSUMER  
SERVICE,

Defendant.  
-----X

CIVIL ACTION FILE NO.

COMPLAINT

### **PRELIMINARY STATEMENT**

This action, brought pursuant to Section 14 of the Food Stamp Act of 1977 and pursuant to Section 279.10 of the Food Stamp Program Regulations, is for judicial review of the administrative determination of the United States Department of Agriculture, the Food and Consumer Service (FCS), and the Northeast Regional Office regarding charging violations and for an order of the court temporarily staying the administrative action under review pending disposition of the de novo trial or an appeal from the trial.

### **JURISDICTION**

1. This action arises under the Food Stamp Act of 1977, U.S.C. Sections 2011 et seq.
2. All statutory and regulatory conditions precedent for the filing of this action have been fulfilled.

### **THE PARTIES**

3. Plaintiff, FRANKLYN F. LUGO, owner of the Ivana Grocery, owns and operates

a grocery store business located at 1665 Topping Avenue, Bronx, New York.

4. FRANKLYN F. LUGO, at all times relevant was and is the owner of grocery business located at 1665 Topping Avenue, Bronx, New York.

5. Defendant, United States, is the sovereign and federal government which conducts and implements the Food Stamp Program through its agency, the United States Department of Agriculture, The Food & Consumer Service, hereinafter referred to as "FCS".

6. That the plaintiff has been and is a licensee of the FCS, participating in the food stamp program as Authorization Card Number FNS 0100468 for ten (10) years.

#### FACTS

7. It is alleged by the defendant herein that during the months of June 2007 to August 2007, the Department of Agriculture conducted an investigation of regulatory compliance in plaintiff's place of business and that in June 2007 to August 2007 food stamps were accepted and in exchange certain food or FCS eligible items were sold under conditions violative of the Act. Upon administrative adjudication and later review certain alleged violations were dismissed or waived, but plaintiff admitted to having extended credit to hungry indigent residents in technical violation of the Act. The defendant accepted those admissions in full satisfaction of all alleged violations.

8. On or about November 7, 2007, approximately four (4) months later after the investigation, FCS mailed notice to the plaintiff alleging these program violations which notice was received by plaintiff.

9. That plaintiff without benefit of counsel responded to the charges at the FCS field



office in New York City and admitted to a number of credit transactions for the benefit of hungry residents, to wit: that plaintiff extended credit to indigent food card holders and charged the debits to the customers' EBT cards later when more EBT benefits became available to these customers.

10. During the long interval between the alleged last date of alleged violation, August 2007, it is not alleged by the FCS that any other violations occurred, nor have any occurred to the present date.

11. That it has not generally been alleged by FCS that the owner of the grocery store generally participated in these alleged violations; nor has it been alleged that they were engaged in for profit or for any venal reason.

12. That the determination after plaintiff's written submission of explanation was a full year disqualification from participation in the food stamp program, by letter from defendant dated January 9, 2008.

13. That plaintiff requested and was granted an administrative review of the determination of permanent disqualification which was issued.

14. That the administrative review officer of defendant upheld the initial determination by letter dated February 28, 2008 purportedly pursuant to Section 278.6(e)(4) and received March 1, 2008.

15. Plaintiff denies that any venal or intentional violations occurred. However, even though plaintiff technical violations, the plaintiff should be subject to a civil money penalty in lieu of one year disqualification. First, this is because the agency failed to fully consider inter alia that the disqualification of plaintiff would result in neighborhood hardship. That as a result of the foregoing, the level of offense and hence sanctions against plaintiff which is properly imposable,



would be pursuant to Section 278.6(f), a civil money penalty.

16. By necessary implication of the defendant's own decision dated February 28, 2008 any violations were not venal or financially motivated.

17. The FCS violated the agency's regulations at Section 278.6(f) in that FCS failed to find applicable and levy a civil monetary penalty in lieu of the disqualification period. The administrative review ruling dated February 28, 2008, shows that the agency only apparently sought to ascertain, in reaching its decision, whether "other area stores" existed, i.e., said decision fails to reflect what criteria, if any, the appeals branch employed for determining "comparability". Rather the review decision appears to blindly apply an inappropriate criteria to wit: whether there is one other store existing within a mile of plaintiff's store. The agency fails to properly evaluate or determine if this alleged other store is comparable in the terms of the regulation in reference to either variety of foods offered or comparability of prices to wit:

"(f) whether there is no authorized retail food store in the area selling a large variety of staple food items at comparable prices."

18. The imposition of a draconian discipline of a one year disqualification which is tantamount to closure of the plaintiff's store for having provided food staples to hungry indigents on credit constitutes an abuse of administrative discretion and/or denial of substantive due process.


19. The imposition of a one year disqualification for the feeding of hungry indigent persons through the extension of credit is so unreasonable, arbitrary, and capricious as to constitute both an abuse of discretion and also a deprivation of substantive constitutional due process, as applied.

20. The decision of defendant also constitutes a misconstruction of the Secretary's regulations including 278.6(e)(4) and 278.6(e)(7).

WHEREFORE, it is respectfully prayed that the Department of Agriculture, Food and Consumer Service's disqualification of the grocery store herein effective March 30, 2008 be stayed and that a preliminary injunction shall issue herein after due notice of this application therefore and that in furtherance thereof defendant be ordered on a day fixed to show cause why said preliminary and permanent injunction should not be granted; and

That pending the hearing hereof, a restraining order issue restraining the defendant and each of them, their agents, representatives and employees, from enforcing the one year disqualification of the firm herein until a trial de novo shall be had to determine the validity of the administrative action for such other and further relief as the Court may deem just and proper.

Dated: Bronx, New York  
March 24, 2008

  
\_\_\_\_\_  
PETER R. SHIPMAN, ESQ. (9780)  
CODELIA & SOCORRO, P.C.  
Attorneys for Plaintiff  
1967 Turnbull Avenue, Suite #6  
Bronx, New York 10473  
(718) 931-2575

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
FRANKLYN F. LUGO,

Plaintiff,

- against -

UNITED STATES DEPARTMENT OF  
AGRICULTURE, FOOD AND CONSUMER  
SERVICE,

Defendant.  
-----X

CIVIL ACTION FILE NO.

**RULE 11 CERTIFICATION**

PETER R. SHIPMAN, ESQ., an attorney at law duly authorized to practice in the Southern District of New York, certifies that he knows of no falsity of the within documents and same is not frivolous.

Dated: Bronx, New York  
March 24, 2008

  
\_\_\_\_\_  
PETER R. SHIPMAN, ESQ. (9780)

Case No. \_\_\_\_\_

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

FRANKLYN F. LUGO,

Plaintiff,

- against -

UNITED STATES DEPARTMENT OF AGRICULTURE, FOOD AND CONSUMER  
SERVICE,

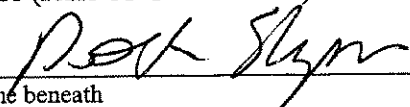
Defendant.

**SUMMONS AND COMPLAINT**

CODELIA & SOCORRO, P.C.  
Attorney(s) for Plaintiff(s)  
1967 Turnbull Avenue, Suite #6  
Bronx, New York 10473  
(718) 931-2575

To

Signature (Rule 11 Certification)



Print name beneath

PETER R. SHIPMAN #9780

Service of a copy of the within is hereby admitted.

Dated: \_\_\_\_\_

JUN-25-2008 10:54

US ATTORNEYS OFFICE

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PAGE 02/03  
P.02/05

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

..... x  
FRANKLYN F. LUGO,

Plaintiff,

08 Civ 2960 (RJS) (RJS)  
ECF Case

- against -

STIPULATION AND  
ORDER OF STAY  
OF DISQUALIFICATION

THE UNITED STATES OF AMERICA,

Defendant.  
..... x

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned parties, by their respective counsel, that the stay of plaintiff's disqualification from participation in the Food Stamp Program, currently in effect, shall remain in effect retroactively from May 31, 2008, until ten days after the Court rules on Defendant's motion for summary judgment, to be filed in accordance with the briefing schedule set forth in the Court's Order dated May 28, 2008, or as the Court otherwise directs.

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JUN-25-2008 13:54

US ATTORNY'S OFFICE

PAGE 03/03  
P.03/05

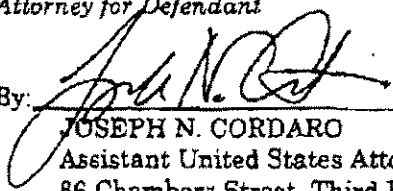
Dated: Bronx, New York  
June \_\_, 2008

CODELIA & SOCORRO, P.C.  
*Attorneys for Plaintiff*

By:   
PETER R. SHIPMAN, ESQ.  
1967 Turnbull Avenue, Suite 6  
Bronx, New York 10473  
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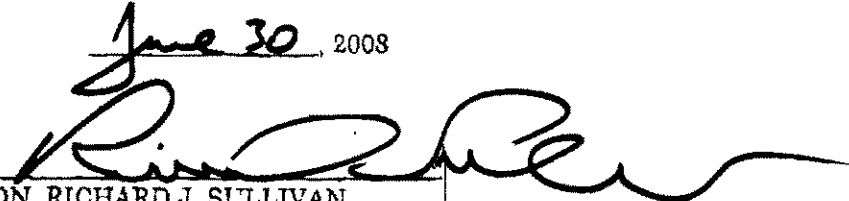
Dated: New York, New York  
June 25, 2008

MICHAEL J. GARCIA  
United States Attorney for the  
Southern District of New York  
*Attorney for Defendant*

By:   
JOSEPH N. CORDARO  
Assistant United States Attorney  
86 Chambers Street, Third Floor  
New York, New York 10007  
Telephone: (212) 637-2745  
Facsimile: (212) 637-2686  
Email: joseph.cordaro@usdoj.gov

SO ORDERED.

Dated: New York, New York

  
HON. RICHARD J. SULLIVAN  
UNITED STATES DISTRICT JUDGE

CHAPTER 10  
FINAL DETERMINATIONS  
DISQUALIFICATIONS AND FINES

1010 REVIEW OF RECOMMENDATION AND CASE FILE.

A Background. The determining office shall review the background material in the case file for completeness. Any missing documentation relevant to the determination shall be requested from the field office, or other providing office. Items to be checked include:

- 1 Copies of WARNING (confirming) letters issued to the firm within the 3-year period prior to the investigation;
- 2 A record of the monitoring and compliance visits with the firm for the 3-year period prior to the investigation; and
- 3 A reference to any previous disqualification, assessment of a CMP, or other administrative action against the firm.

B Investigative Report and Firm's Reply. The determining office shall consider the investigative report and the firm's reply in making the final determination, and shall also consider any reply by the investigating office to alleged discrepancies raised by the firm. If the firm fails to submit a reply to the charge letter, the lack of response shall not be considered as an admission of violations.

1020 DISQUALIFICATION'S. Section 278.6(e) of the FS Program regulations authorizes the FNS to disqualify for a specific period of time any authorized firm which violates FS Program regulations. This action taken against an authorized firm (commercial business entity or enterprise of one or more persons) for violations revealed during a Departmental or State Law Enforcement Bureau investigation has important consequences. The decision to sanction a firm is a very significant one.

Disqualification of an authorized firm will mean not only a loss of business, but also adverse publicity for the firm. In addition, the disqualification may result in the



permanent loss of food stamp customers to other firms. If the firm is highly dependent upon food stamp business, disqualification may mean that the firm will be forced to close.

Failure to sanction violating firms will adversely affect the food stamp business of other authorized firms in the vicinity, particularly if these firms have lost business due to the violations. If the violating firm is not sanctioned and continues to violate, its competitors may feel compelled to violate. Furthermore, others who have been violating may disregard the regulations more flagrantly if they see that violators are not being punished.

In order to protect the Program from abuse, appropriate penalties shall be imposed against authorized firms found to be violating. It is essential that these penalties be applied in a consistent manner and be based on fully documented evidence.

FNS REGIONAL OFFICES ARE IN THE BEST POSITION TO DETERMINE WHAT PROCEDURAL STEPS ARE NECESSARY FOR ITS STAFF AND ORGANIZATIONAL UNITS TO ASSURE THAT FINAL DETERMINATIONS ARE MADE IN ACCORDANCE WITH THE REGULATIONS AND ARE THOROUGHLY DOCUMENTED. WHICHEVER ORGANIZATIONAL UNIT (FIELD OFFICE OR REGIONAL OFFICE) IS MAKING THE FINAL DETERMINATIONS, IT IS RESPONSIBLE FOR HAVING AT ITS DISPOSAL THE INFORMATION NEEDED TO MAKE APPROPRIATE AND WELL SUBSTANTIATED FINAL DETERMINATIONS IN ACCORDANCE WITH THE REGULATIONS.

It is equally important that regional offices, which make determinations based upon field offices recommendations, and the ARB which may review regional office determinations and, if necessary, make other determinations in place of the regions, all operate under similar understandings of Agency policy concerning the application of sanctions.

It is not possible to develop strict guidelines that will precisely fit all situations involving evidence of violations by individuals or firms. The determining official shall strive for a determination which is both reasonable and consistent with regulations and with previous determinations in similar cases.

1021 Evaluating Evidence. Regional and field office personnel shall consider the following factors in making recommendations for, and determinations of, administrative action:

- A Type of Violation and Extent of Program Harm. Consideration of the following factors will determine the extent of program harm resulting from the violations being reviewed.
- 1 Extent of All Violations. A transaction is the exchange or sale of food stamp benefits for one or more eligible and/or ineligible items at one specific time. The number of violative transactions stated in the investigative report may be an indication of the magnitude of the violations. As such, the number of violative transactions, plus the nature and scope of the violations, are important elements in comparing cases to assure that similar cases will receive similar treatment. The types of transactions are:
    - a Inadvertent. The sale of one or two inexpensive (marginal or common--see paragraph 2 a, below) nonfood items in one or two transactions.
    - b Careless. The sale of a total of three inexpensive nonfood items over one, two or three transactions, meaning that the owner or management was not thorough in supervising personnel of the firm.
    - c Usual. Four or more sales of at least three inexpensive nonfood items each, without a substantial attempt to comply, indicating that selling such items for food stamp benefits is the firm's usual practice. Cases in which there is more than one inexpensive nonfood sale where comments are made indicating that store personnel are aware that they are violating, but, they proceed to do so, could be considered usual practice.
    - d Serious. Three sales of expensive (major--see paragraph 2 a, below) nonfood items, in

addition to, or in conjunction with, four sales of inexpensive nonfood items, indicating that selling such items for food stamp benefits is the firm's usual practice.

- 2 Ineligible Item Violations. To properly evaluate ineligible item violations, the reviewer shall consider the following:

- a Type of Ineligible Items. Ineligible items are divided into three types--marginal, common, and major. The reviewer must carefully review the types of ineligible items sold in considering the seriousness of the violations.

- (1) Marginal ineligible items are items such as hot food, canned pet food, and any orally administered patent medicine which can easily be mistaken for an eligible item.

- (2) Common ineligible Items are easily identifiable ineligible items of low cost such as cleaning products, paper products, and other common household items. This category also includes alcoholic beverages and tobacco products in quantities too small to count as major ineligible items, as defined in subparagraph (3), below.

- (3) Major ineligible items are expensive or conspicuous nonfood items, and consist of the following:

- (a) Alcohol. In a single transaction, any one of the following:

- (1) Any quantity of distilled spirits (hard liquor);

- (2) A "six pack" of beer or malt liquor;

- (3) A "four pack" of wine coolers;

(4) 48 ounces or more of beer,  
malt liquor or wine coolers;  
or

(5) .75 liter or more of wine.

(b) Tobacco. In a single transaction,  
any one of the following:

(1) One carton (or ten packs) of  
cigarettes; or

(2) Any combination of tobacco  
products (other than  
cigarettes) with a total  
stated price (excluding sales  
taxes) of \$10 or more.

(c) Gasoline. Any amount.

(d) Expensive Items. Any ineligible  
item with a stated price  
(excluding sales taxes) of \$10 or  
more.

b Quality and Kinds of Items Purchased. The  
reviewer shall compare the quantity and  
types of ineligible items sold in each  
transaction, to the quantity and types of  
eligible items sold in the same transaction,  
as well as refusals in the same transaction.  
Such a comparison will help the reviewer in  
judging whether that transaction was clearly  
violative or whether the ineligible items  
could easily have been sold without being  
noticed by the clerk. In the absence of a  
major ineligible item, or in the absence of  
comment(s) or action(s) by a clerk which  
clearly indicates that the clerk knew that  
some items were ineligible, and to be  
considered clearly violative, a transaction  
must consist of ineligible items sold  
comprising not less than 30 percent of the  
total number of items purchased. However,  
any transaction in which a major ineligible  
item is purchased alone, or with common

ineligible items, shall be considered a clearly violative transaction, regardless of whether or not the 30 percent ratio is met. In counting the number of items sold in a transaction, the reviewer should bear in mind that items of the same kind and brand are often sold in combination. In view of this, all items of the same size and brand, sold in combination in the same transaction, shall be counted as one item. Thus, two cans of Brand X beans sold two for one dollar would be counted as one item, not two, just as four bars of Brand X soap sold for one dollar would be counted as one item, not four. However, two cans of Brand X beans sold individually at 53 cents each or two bars of Brand X soap sold individually at 53 cents each would count as two items. This paragraph does not apply to tobacco or alcoholic products.

- c Hot Foods. The Compliance Branch Handbook (Handbook 317) states that investigators should avoid having items such as hot foods constitute the bulk of ineligible items purchased. There are circumstances, however, when the situation requires purchasing marginal ineligibles. For example, when investigating a pizza store, an investigator may find that the only, or primary, ineligible item sold by the firm is hot food. Thus, when there is a wide variety of ineligibles from which to choose, and the purchase of items such as hot food could have been avoided, consideration of these items shall not be included when making final determinations. However, if purchasing marginal items is unavoidable and they are necessary to the investigation, consideration shall be given to these items in reaching a final determination.

- 3 Trafficking. A firm has an affirmative duty to prevent trafficking on its premises. The purchase of any amount of food stamp benefits, ATP cards or other program access devices, for any amount of cash shall warrant permanent disqualification.

Accepting coupons, ATP cards, or other program access devices in exchange for firearms, ammunition, explosives, or controlled substances regardless of whether or not the firm benefited from the violation, or the owner or management of the firm had knowledge of the violation also warrant permanent disqualification. Ownership's or management's lack of knowledge of trafficking violations by employees, or the absence of ownership or management participation in trafficking violations, comes into consideration only when determining a firm's eligibility for a trafficking civil money penalty in lieu of permanent disqualification for trafficking.

- 4 Cash Change Violations. Under the provisions of section 7(b) of the FS Act of 1977, as amended, cash may be returned as change in food coupon transactions provided that the cash returned does not equal or exceed the value of the smallest food coupon denomination. The seriousness of individual cash change violations depends upon the value of the cash change involved, and is different from trafficking in that the cash change transaction involves the purchase of food, and not the willful and fraudulent exchange of coupons for cash alone.

- a Multiple Transactions of 99 Cents or Less. While cash change of 99 cents or less can legally be returned in a food coupon transaction, it is illegal for a firm to engage in a series of transactions for the purpose of generating cash change for a recipient, whether or not the recipient intends to use the change immediately to purchase ineligible items. In a situation where a store owner/clerk, either during an investigative visit or in a previous investigative visit, has **initiated** a series of transactions in order to allow an investigator or investigative aide to purchase ineligible items, the ineligible items shall be considered to have been purchased with food coupons. The investigative report must clearly indicate that during the investigative visit(s), the



store owner/clerk **deliberately** structured the series of transactions in such a way to give the investigator enough cash change to purchase the ineligible item(s).

- b Cash Change Manipulation(s) Totaling \$1.00 to \$1.99 During a Single Transaction. The return of cash change in this amount should be considered an administrative violation, that is, not as serious as the sale of ineligible items. However, such violations can reflect the overall level of compliance by a firm, and should not be disregarded during an overall analysis of the case.
  - c Cash Change Manipulation(s) Totaling \$2.00 to \$9.99 During a Single Transaction. The return of cash change in amounts from \$2.00 to \$9.99 should be considered as serious as an equivalent value of common ineligible items.
  - d Cash Change Manipulation(s) Totaling \$10 or More During a Single Transaction. Cash change of \$10 or more should be considered as serious as an equivalent value of a major ineligible item.
- 5 Credit Payment Violations. The acceptance of food stamp benefits in payment of credit accounts is a violation of the regulations, regardless of whether or not the items sold on credit and subsequently paid for with food stamp benefits were eligible. However, the distinction between types of ineligible items noted in paragraph 2 a, above, applies to the evaluation of credit violations as well as to the sale of ineligible items for food coupons. To assess an appropriate penalty for the acceptance of food stamp benefits for food bought on credit, each violation should be considered as serious as the outright sale of common ineligible items. Similarly, as is discussed in paragraph B, below, investigative cases shall be reviewed to determine the reasons for the violations. For example, the total cost of items purchased during a transaction may be more than the value of the food coupons which the



recipient has at that time. As a result, the clerk may state that the difference in value may be paid later. If the recipient returns to the firm and the same clerk, recalling the earlier transaction, adds the cost difference of the previous transaction to the cost of the current transaction, a violation has occurred. However, a single instance is not sufficient evidence to determine a firm's practice to accept food stamp benefits on credit accounts. If this type of transaction occurs four times during an investigation, and any or all of the persons referred to in paragraph B, below, took an active part in the violations, firm practice shall be assumed to exist.

- 6 Transactions Between Firms and/or Individuals. The FS Act of 1977, as amended, and regulations prohibit or limit certain types of transactions. Prohibited transactions include sales of merchandise for food stamp benefits by an authorized food wholesaler to a retail firm which it is not specifically authorized to serve; the sale of meals for food stamp benefits by an authorized communal dining facility, drug addiction or alcoholic treatment program, group living arrangement, meal delivery service or shelter for battered women and children to persons not authorized to purchase meals with food stamp benefits; and exchanges of merchandise for food stamp benefits between authorized retail firms. The above violations are considered to be equivalent to the sale of common ineligible items. Unless the amount of a single transaction is \$100 or more, three violations must occur during an investigation before a disqualification period may be assessed. Transactions between an authorized firm and an unauthorized firm or individual who is known not to be a certified food stamp recipient or a person authorized to act for a recipient are considered to be equivalent to the sale of major ineligible items.

- B Reasons for Violations. In addition to examining the type and extent of violations that occur, regional and field office personnel shall also examine the reasons for violations revealed by an investigation. Violating

firms which have demonstrated a deliberate disregard of the regulations and have shown that it is their normal practice to violate, as opposed to carelessness or poor supervision, shall be subject to a three- or five-year disqualification. (Refer to paragraphs 1022 D and E, below.) Firm practice has been established when there has been a minimum of four sales of ineligible items, and any or all of the following persons took an active part in those violations:

- 1     The owner, family members or relatives who are regularly involved in the operation of the firm;
- 2     Members of management including a person designated as a clerk, but who is in effect operating the firm in the absence of the owner for extended periods of time or on a regular basis; or
- 3     Two or more clerks who, based on investigative evidence, customarily engage in violative transactions in a case in which the record includes documentation that the owner or corporate official of the firm had been advised of the possibility of violations occurring and the consequences of such violations. Refusal(s) by more than one clerk will usually negate a finding of a firm's practice to violate.

C     Refusals To Violate. Complete or partial refusals to violate program regulations must be carefully examined to determine whether reported violations were possibly a result of error or misunderstanding. Attention should be given to which personnel of the firm were involved, the types of attempted violations involved in the refusals, and the extent and pattern of the refusals. For example, a case in which clerks sold ineligible items and the owner refused to do so would be considered less serious than a case in which the opposite occurred.

In evaluating partial refusals, attention should be given to the types and quantities of items sold and refused, and the number of times partial and complete refusals occurred. Also, remarks of clerks may be significant in this evaluation. A violative transaction in which there has been a partial refusal

may require special consideration for the firm. For example, refusals to sell major ineligible items or to discount food stamp benefits would diminish the seriousness of a transaction in which one or two marginal or common ineligible items were sold without refusal.

- D Secondary Evidence. The reviewer should consider not only the violations in which investigators or aides participated, but also any secondary evidence of violations revealed to investigative personnel in statements from certified recipients, employees of the firm, and others. Refer to section 740, above. This evidence must be included in the investigative report and in the charge letter, in order to be considered. To be considered in a final determination, secondary evidence must have been received from a firsthand source; i.e., a witness or participant in the violations.

Statements, even if written in the report by the investigator, must be signed by the person supplying the information in order to be considered. Secondary evidence will be given the same weight as evidence obtained by conventional shopping techniques used by investigators or aides, as long as the evidence appears to be credible. However, since physical evidence usually does not exist to support secondary evidence, determining credibility will depend upon consideration of factors such as:

- 1 Existing information indicating the reliability of the individual admitting violations, or reporting witnessed violations;
- 2 The amount of specific detail provided which concerns the witnessed or admitted violations; and
- 3 The availability of the witness for testifying at a trial.

- E Previous Compliance Action. Previous compliance action is a previously-issued WARNING (confirming) letter, or any face-to-face contact which has been documented in a certified WARNING (confirming) letter to the owner or corporate official, and which is conducted to

confront the firm with the possibility that violations might be occurring, and to caution the firm about the consequences of violations. Such action may have been taken as a result of admitted or observed violations, rumors or complaints, unusually high or erratic redemption's, or some other cause for suspicion.

For previous compliance action to be considered in any current determination, the action must have occurred within three years of the first violation noted in any recent investigation of the firms. If there has been a change of management in the firm since the compliance action was taken, consideration shall be given to whether or not the owner or a corporate official of the firm was made aware of the action, regardless of the individual contacted during the compliance visit.

- 1022 Disqualification Requirements. After the complete investigative and case records are examined the determining office shall make a recommendation for final action consistent with section 278.6(e) of the FS Program regulations. The final determination made by that office shall be imposed upon the firm. The circumstances warranting the issuance of a warning letter and the various periods of disqualification are discussed below.

As a general rule, a case must have flagrant violations such as trafficking in food stamp benefits or ATPs, or a minimum of three clearly violative transactions involving ineligible items to warrant a sanction. Furthermore, as discussed in paragraph 1021 B, above, the number of transactions in a case is critical to the resolution of the reasons for the violations. In the absence of flagrant violations such as trafficking or the sale of major ineligible items, the first sanction for a firm may not be greater than one year unless there are at least four clearly violative transactions involving common ineligible items which establishes that it is the firm's practice (as defined in paragraph 1021 B, above) to sell common ineligible items; a firm may not be assigned a period of disqualification greater than three years unless any or all of the persons referred to in paragraph 1021 B, above, took an active part in the violations and there are four clearly violative transactions in which at least three of the transactions involved the selling of major ineligible items or if there is an exchange of food stamp benefits for cash. This establishes that it is the firm's practice to sell

major ineligible items or exchange of food stamp benefits for cash.

A previous FS Program sanction, from any year, resulting from an investigation or redemption's-exceeding-food sales case will warrant a sanction twice the length of that which would be warranted by regulation for a first violation. The sanction must have been against the same owner at the same location, unless the owner had only one firm at the time of the first sanction, and the firm involved in the current investigative case is clearly a replacement for a previously-owned firm. If a sanction has twice before been imposed on a firm, the third sanction shall be a permanent disqualification.

A Permanent Disqualification. A permanent disqualification is the maximum disqualification period permitted by the Act and program regulations, and is reserved for the most serious cases. A firm shall be disqualified permanently if personnel of the firm (clerk or other firm employees; management personnel or owners) commit flagrant violation, such as:

- 1 Trafficking in food stamp benefits or other program access device (e.g., EBT cards, ATP cards) for cash in any amount on at least one occasion; or
- 2 Trafficking in firearms, ammunition, explosives, or controlled substances; or
- 3 Violations occurring which are sufficient to warrant a disqualification and the firm had twice before been sanctioned.

B Ten-Year Disqualification. Assign a 10-year disqualification if current violations warrant a five-year disqualification and the firm has had a previous sanction.

C Six-Year Disqualification. Assign a six-year disqualification if current violations warrant a three-year disqualification and the firm has had a previous sanction.

- D Five-Year Disqualification. Assign a five-year disqualification if the firm has had no previous sanction, had been previously warned of the possibility that violations may be occurring and of possible consequences of violating the regulations, and the investigative evidence shows that:
- 1 It was the firm's practice to sell major ineligible items in exchange for food stamp benefits [must have four clearly violative transactions in which at least three of the transactions involved the selling of major ineligibles and any or all of the persons referred to in paragraph 1021 B, above, took an active part in the violations]; or
  - 2 The firm's food stamp redemption's for a specified period of time exceeded its food sales for the same period of time; or
  - 3 A wholesale firm's redemption's of food stamp benefits for a specified period of time exceeded the redemption's of all the specified authorized retail food firms, nonprofit cooperative food-purchasing ventures, GLA' s, drug addiction and alcoholic treatment and rehabilitation programs, homeless meal providers, and shelters for battered women and children for which the wholesale food concern was authorized to serve as a redemption outlet during that time; or
  - 4 A wholesale firm's stated redemption's of food stamp benefits for a particular retail food store, nonprofit cooperative food purchasing venture, GLA, drug addict and alcoholic treatment program, homeless meal providers, or shelters for battered women and children exceeded the actual amount of food stamp benefits which that firm or organization redeemed through the wholesaler over a specified period of time; or
  - 5 The retail or wholesale firm knowingly accepted food stamp benefits from an unauthorized firm or an individual known to be not legally entitled to food stamp benefits.



E Three-Year Disqualification. Assign a three-year disqualification if the firm it is the firm's first sanction and the evidence shows that:

- 1 It was the firm's practice (as defined in paragraph 1021 B, above) to commit violations such as the sale of common ineligible items in quantities usually found in a food firm transaction, and the firm had been previously warned of the possibility that violations were occurring and of possible consequences of violating the regulations; or
- 2 Any of the situations described in paragraph D, above, occurred but FNS had not previously warned the firm of the possibility that violations were occurring or the possible consequences of violating the regulations; or
- 3 The firm is an authorized communal dining facility, drug addiction or alcoholic treatment and rehabilitation program, GLA, homeless meal providers, meal delivery service or shelter for battered women and children and it was the firm's practice to sell meals in exchange for food stamp benefits to persons not eligible to purchase meals with food stamp benefits, and the firm had been previously warned of the possibility that violations were occurring and of the possible consequences of violating the regulations; or
- 4 On three or more separate occasions a wholesale firm accepted food stamp benefits from an authorized retail firm for which it was not authorized to serve as a redemption outlet and the wholesale firm had been previously warned of the possibility that violations were occurring and of the possible consequences of violating the regulations; or
- 5 The retail firm is authorized, and it engaged in food stamp benefit transactions on three or more separate occasions with other authorized firms not including treatment programs, GLA's or shelters for battered women and children, and the firm had been previously warned of the possibility that violations were occurring and of



the possible consequences of violating the regulations; or

- 6 The firm is an authorized retail food store and on three or more occasions personnel of the firm engaged in food stamp benefit transactions with other authorized retail stores, not including treatment programs, GLAs, homeless meal providers, or shelters for battered women and children and the firm had been previously warned of the possibility that violations were occurring and of the possible consequences of violating regulations.

F One-Year Disqualification.

- 1 Assign a one-year disqualification if the firm has had no previous sanction, the ownership or management committed violations such as the sale of common nonfood items, but FNS had not previously warned the firm of the possibility that violations were occurring or of the possible consequences of violating the regulations. This period of disqualification may also be assigned if current violations warrant a six-month disqualification and the firm has had a previous sanction.
- 2 Assign a one-year disqualification if the firm has not been previously warned and the owner or management engaged in food stamp benefit transactions with other authorized firms not including treatment programs, GLAs, or shelters for battered women and children.
- 3 Assign a one-year disqualification if an authorized communal dining facility or restaurant has not been previously warned and the owner or management sold meals to persons not eligible to purchase them.

G Six-Month Disqualification.

- 1 Assign a six-month period of disqualification if the firm has had no previous sanction, and the evidence indicates that the firm has committed violations such as the sale of common ineligible

items in at least three transactions due to carelessness or poor supervision.

2 Assign a six-month period of disqualification if the firm has not been previously warned and non-owner or non-management personnel engaged in a minimum of three food stamp benefit transactions with other authorized firms not including treatment programs, GLAs, or shelters for battered women and children.

3 Assign a six-month period of disqualification if an authorized communal dining facility or restaurant has not been previously warned and non-owner or non-management sold meals to persons not eligible to purchase them.

H Warning Letter. Send the firm a warning letter if the investigation discloses only:

- 1 One or two sales of common ineligible items; or
- 2 Minor violations such as the return of an endorsed one-dollar food coupon as change or a sale of a marginal ineligible item (e.g., hot foods), except as noted in paragraph 1021 A 4 c, above.

I Administrative Action for Multiple-Location Firms. When only one location of a firm (under individual or corporate ownership) that operates in more than one location is found violating, only the one location would be sanctioned if the violations warrant a sanction. If sanctions are warranted for two or more locations investigated at the same time, the sanction for each violating location must be determined independently of each other and based solely on the violations committed at each individual location.

- 1 Owner Involvement in Violations. The personal involvement of the owner of the firm in serious violations is sufficient basis for withdrawing the authorizations of other locations of the firm under the same ownership, based on lack of business integrity.

- 2 Violations in More Than One Location. If ownership is not involved in the violations, but a number of locations under the same ownership are investigated within approximately the same time period, and the determining office can examine all the reports before taking action on the violations of any single location, the results of the investigations taken as a whole should be weighed to determine if the evidence indicates an overall operating practice of the firm, as opposed to that of individual locations. For example, if more than one location of a multiple-location firm is investigated and the majority of the investigated firms violate, it would be appropriate to withdraw the authorization of the other locations of that firm, based on the lack of business integrity of the ownership.

- J Accepting Food Stamp Benefits From Unauthorized Firms or Individuals. Section 278.6(e) (2) (v) of the regulations provides that a firm may be disqualified for 5 years if personnel of the firm knowingly accepted food stamp benefits from an unauthorized firm or an individual known not to be legally entitled to possess food stamp benefits and the firm had been previously warned that violations may be occurring. Section 278.6(e) (3) (ii) provides that a firm shall be disqualified for 3 years if any of the situations included in section 278.6(e) (2) occurred but the firm had not been previously advised that such violations were occurring.

If the case record clearly indicates that the investigator established during the investigation that he was an unauthorized individual or was representing an unauthorized firm, the disqualification periods of 3 or 5 years, as discussed above, apply. If the authorization status of the investigator is not established in the case record, the assumption should be made that the investigator represented an authorized firm, which will cause a lesser penalty.

Keep in mind that there must be at least one trafficking violation, or three or more violative transactions involving the acceptance of food stamp

benefits for merchandise before a sanction can be imposed.

- K Accepting Food Stamp Benefits From Authorized Firms. Section 278.6(e) (3) (v) of the regulations provides that a firm would be disqualified for 3 years if personnel of the firm have engaged in food stamp benefit transactions with other authorized retail stores (not including treatment programs, etc.) and the firm had been previously advised of the possibility that violations were occurring. Section 278.6(e) does not specifically address the penalty for this type of violation if the firm had not previously warned. However, section 278.6(e) (4) and (5), respectively, are legally sufficient to cover such situations and must be applied as explained below.

If a firm was not previously advised of violations, section 278.6(e) (4) requires that a 1 year disqualification be imposed if it is the first sanction for the firm and the ownership or management personnel of the firm have committed violations. Section 278.6(e) (5) requires that if non-management or non-owner personnel committed the violations, a 6-month disqualification for the violations will be imposed. These penalties in these regulatory citations must be used when firms accept stamp benefits from other authorized firms and have not been previously warned.

Keep in mind that there must be at least one trafficking violation, or three or more transactions involving the acceptance of food stamp benefits for merchandise before a sanction can be imposed.

- 1030 FINES FOR ACCEPTANCE OF LOOSE COUPONS. Section 278.6(1) the FS regulations gives FNS the authority to establish fines against any retail food store or wholesale food concern that accepts loose coupons that are not accompanied by the corresponding book cover, other than the denomination of coupons used for making change. Coupons accepted from authorized providers of meals for the homeless are exempted from this requirement. The amount of a fine established for the acceptance of loose coupons cannot be compromised or settled. Fines for loose coupons should be assessed when, in the judgment of the determining official, other civil remedies, such as prosecution under

the False Claims Act, are unlikely. If we choose to pursue criminal prosecution, loose coupon fines may be pursued as well.

- A Investigative Protocol Used To Establish Fines. Fines for the acceptance of loose coupons will only be assessed in cases in which a clear pattern of abusive acceptance of loose coupons has been established during the course of a formal investigation. The investigative protocol for establishing such fines requires the completion of three separate transactions involving the acceptance of at least 3 loose coupons during each of the transactions.
- B Amount of Fine for the Acceptance of Loose Coupons. The fine to be assessed against a firm found to be accepting loose coupons shall consist of a base fine of \$500 per investigation **plus** an amount that is equal to double the face value for each loose coupon that was illegally accepted during the course of the investigation. For example, during an investigation, three separate transactions of three loose \$10 coupons were made. Using the formula, the fine would amount to the \$500 base fine **plus** 2 X \$90 (the face value of the coupons transacted) to equal a total assessment of a \$680 fine for the acceptance of loose coupons in this case. The fine shall be assessed and collected in addition to any fiscal claim established by the determining office. Only the ineligible items purchased shall be counted when assessing the amount of the fiscal claim. Fines for loose coupons in such cases should be assessed when in the judgment of the determining official, other civil remedies, such as prosecution under the False Claims Act, are unlikely. **Note: The determining office cannot reduce or adjust the amount of the fine. The formula as prescribed in the regulation must be used.**
- C Notice of the Fine. The determining office shall send a charge letter before making such a determination. See Exhibit 20, attached. The letter shall specify the violations which constitute the basis for a fine. The determining office shall also send a determination letter, certified-mail return receipt requested, to the violating firm informing it that it has 30 days upon receipt of the letter to pay the fine. See Exhibit 21, attached. The letter shall also inform the

firm of the amount of the fine and that it must pay the fine in full to the Regional FMD within 30 days. In addition, the letter shall inform the firm that if it fails to pay the fine within 30 days, its authorization will be withdrawn. Furthermore, multi-unit firms shall be notified that other authorized locations of the firm which are under the same ownership also will be withdrawn until the fine is paid in full.

D Fines Not Paid Within 30 Days.

- 1 Regional FMD Responsibilities. The Regional FMD shall inform the determining office if the fine is paid or not paid within the required time period. If the fine has not been paid within the appropriate 30-day time period, the firm shall be billed for the balance plus any interest accrued. If the firm fails to pay the fine within the required timeframe, the Regional FMD shall take the necessary steps to collect the fine and/or have the U.S. Attorney institute judicial action against the store or concern to collect the fine.
- 2 Determining Office Responsibilities. The determining office shall send a withdrawal letter, certified mail return receipt requested, to the firm based on the fact that the firm did not pay the fine in full within the required time period. The withdrawal letter shall also state that the withdrawal will remain in effect until the fine is paid in full. The withdrawal letter shall also contain the standard language for administrative review rights, with the withdrawal being effective 10 days from the firm's receipt of the letter, unless an administrative review is requested.

For multi-unit firms, a single withdrawal letter would be sent informing the firm ownership of the withdrawal of all its authorized locations and attaching a list of all authorized locations of the firm, including the location(s) committing the violations. This will accommodate more efficient handling of any requests for administrative review.



E Administrative and Judicial Review Requests. If the firm submits a timely request for administrative review, or if judicial review is timely requested and a stay granted, all administrative and collection action shall be held in abeyance pending the outcome of the review.

F Denial of Authorization For Nonpayment of a Fine. Any requests for authorization shall be denied for any location of a firm which has an outstanding fine.

1040 FINES FOR UNAUTHORIZED THIRD PARTIES THAT ACCEPT FOOD STAMP BENEFITS.

FNS has the authority to impose a fine against any person not authorized to accept and redeem food stamp benefits for violations of any provision of the Food Stamp Act or the program regulations. This would include the acceptance of food stamp benefits by an unauthorized firm since we interpret the term "person" to include a sole proprietorship, partnership, corporation or other legal entity, in addition to an individual. Fines and penalties for unauthorized acceptance of food stamp benefits shall only be implemented in cases when all the violations occurred on or after February 1, 1992.

If applicable, the determining office must await completion of legal action against the subject of the investigation or until the U.S. Attorney declines prosecution and the Regional Attorney (or Attorney in Charge), OGC, closes the file before administrative action (i.e., imposition of a fine) can be taken. Neither the statute nor the regulation limits or restricts our authority to assess such fines to only those cases in which a formal Office of Inspector General or Compliance Branch investigation has been undertaken. For example, fines can be assessed against unauthorized third parties as long as the determining office has documented evidence of the redemption of the food stamps through copies of redemption certificates (RCs) themselves.

In addition, the determining office must document its reasons for concluding that the third party accepted the food stamp benefits with intent to circumvent the regulations. Such a fine would be assessed primarily, but not exclusively, against firms that have been disqualified or withdrawn and are continuing to redeem food stamp



benefits rather than against firms that have changed ownership in which the new owners do not recognize that they are accepting and depositing food stamp benefits in violation of the Food Stamp Program by using the old owner's redemption certificates. This does not prohibit the determining office from assessing a fine against those firms which, after the initial notification that they should cease accepting food stamp benefits until they have been authorized, continue to accept and redeem food stamp benefits by using the inactive authorization number and redemption certificates of a previous owner.

- A Notice of the Fine. The determining office shall send a charge letter informing the firm of the unauthorized acceptance of food stamp benefits and/or other violations disclosed during the investigation before making such determination. In cases involving retail food stores, no individual clerk shall be assessed such a fine; instead, the fine shall be assessed against the firm itself. See Exhibits 22, 24, and 26, attached, (i.e., a charge letter to food retailers, a charge letter to non-food retailers, and a charge letter to individuals). The charge letter shall specify the violations which constitute a basis for a fine and a fiscal claim. The determining office shall also send the unauthorized third party (i.e., food retailer, non-food retailer, or individual) a determination letter, certified-mail return receipt requested, informing the unauthorized party of the amount of the fine and that it must pay the fine in full within 30 days of receipt of the determination letter and the fiscal claim within 15 days of receipt of the determination letter. See Exhibits 23, 25, and 27, attached, (i.e., a determination letter for food retailers, a determination letter for non-food retailers, and a determination letter for individuals).
- B Fines Not Paid Within 30 Days. If the fine has not been paid within the appropriate 30 day time period, the firm shall be billed for the balance plus any interest accrued.

The determining office shall forward a copy of the fine notice to the Regional FMD. The Regional FMD shall inform the determining office if the fine is paid or not paid within the required time period. If

the firm fails to pay the fine within the required timeframe, the Regional FMD shall take the necessary steps to collect the fine and/or have the Attorney General of United States institute judicial action against the person to collect the fine.

- C Withdrawal or Denial of Authorization for Nonpayment of a Fine. The authorization of any firm that is under the same ownership as the unauthorized firm shall be withdrawn if the unauthorized firm fails to pay the fine within the required time period. All firms shall remain withdrawn until the fine is paid in full. In addition, any future requests for authorization shall be denied if there is an outstanding fine.
- D Investigative Protocol. As mentioned in the above paragraph, fines can be assessed against unauthorized third parties without a formal investigation. In such a case, the \$1,000 per violation could not be assessed by transaction, but would instead be assessed against the redemption record. Thus, each RC would represent a violation which would generate a \$1,000 assessment in addition to a calculation of three times the value of the food stamps included on each RC. The investigative protocol for establishing such fines for the unauthorized acceptance of food stamp benefits would be a single transaction involving a minimum of \$10 in food stamp benefits.
- E Amount of the Fine for Acceptance of Food Stamp Benefits by Unauthorized Third Parties. The amount of fine shall be \$1,000 for each violation **plus** an amount that is equal to three times the face value of the food stamp benefits accepted. Therefore, if during an investigation, three separate transactions of \$50 each were accepted by an unauthorized firm, the fine would be calculated as follows: three violative transactions at \$1,000 a piece equals a base fine of \$3,000, plus 3 times the \$50 face value of the three \$50 transactions which would equal \$450, for a total fine of \$3,450.
- F Administrative and Judicial Rights of Unauthorized Third Parties. Unauthorized firms' appeals will proceed through the normal administrative review and/or judicial review system. Thus, if the case is in administrative review, action would be held in abeyance pending the outcome of the review or, if the

case is in judicial review, the granting of a stay pending the outcome of the review.

- 1050 ACTION LESS THAN DISQUALIFICATION. Determining offices are authorized to make final determinations calling for actions less than disqualification in investigative cases, and to close the files on such cases upon completion of any administrative action. Determinations for actions less than disqualification call for final determination WARNING letters or, in some cases, no administrative action.

Determining offices are responsible for setting up effective controls to ensure that determinations calling for actions less than disqualification are made in a consistent, reasonable, and equitable manner.

- 1051 Warning Letters. When the investigative case falls into the warning letter category described in paragraph 1022, above, the determining office shall make a determination for a warning letter.

A Warning Letter in Lieu of Charge Letter. The determining office may send a final determination WARNING letter in lieu of a charge letter if the investigative report reveals no substantial evidence of violations and there is no possibility of disqualification. The determining office shall prepare such a letter and shall distribute the letter in accordance with section 1070, below.

B Warning Letter After Charge Letter Has Been Issued. See section 1050, above. After sending a charge letter and reviewing the investigative evidence and the firm's reply, the determining office may determine that a final determination WARNING letter is proper, and shall then prepare a WARNING letter which refers to the charge letter, and send it to the firm by certified mail-return receipt requested. Exhibit 28, attached, illustrates the letter to be used in such situations. Appropriate changes should be made for firms with multiple locations.

- 1 Address of the Warning Letter. The address used for the charge letter in the case shall also be used for the warning letter. If the owner or responsible official of the firm is not the addressee, the determining office shall send by

certified mail - return receipt requested, a copy of the final determination WARNING letter to the person with a cover letter (see Exhibit 29, attached).

If the firm has a manager who is not the addressee, the determining office shall also send a copy of the final determination WARNING letter to the manager without a cover letter.

- 2 Special Wording for Use When the Firm Is No Longer Participating. If the firm is no longer participating in the program, the following paragraph shall be substituted for the next to the last paragraph of the final determination WARNING letter:

This is an OFFICIAL WARNING from the United States Department of Agriculture concerning the above violations. Although you are not now participating in the Food Stamp Program, this letter and the violations which led to its issuance will become a part of your record. If you are reauthorized to participate at some future date, you should take every precaution to make sure that you and your employees know and follow the Food Stamp Program regulations. A finding that you or your employees are violating the regulations after reauthorization could again result in your removal from participation in the program.

The OIC shall take action to see that this letter is discussed with the firm if it is reauthorized.

- 3 Distributing Copies of the Warning Letter. The determining office shall place the return receipt for the final determination letter WARNING letter and a copy of the letter in the firm's case file. In addition, the determining office shall distribute copies of the WARNING letter in accordance with section 1070, below.

- C Warning Letter Not Delivered. If a final determination WARNING letter is returned as undeliverable by the Postal Service, the field office shall attempt to

hand-deliver the letters. If possible, the letter shall be delivered to the addressee of the letter.

1060 NO ACTION DETERMINATIONS. The determining office may make a determination that no administrative action is necessary, because the source of the evidence is considered totally unreliable and/or there is conflicting evidence which casts considerable doubt on the alleged violations or efforts to deliver the warning letter are unsuccessful. Note: This is an indication that the store no longer exists, thus in such cases, the FOs should initiate action to withdraw the store.

1070 DISTRIBUTION OF CORRESPONDENCE. The determining office shall send one copy of all final determination WARNING letters and other determination letter to the following:

- A Officer in Charge (if applicable);
- B Manager, owner, or district official of firm (warning letters only); and
- C Regional OIG and Regional Attorney, if their files are open.

The determining office shall ensure that the appropriate case number is included on copies of the final determination WARNING letters and other determination letters which are sent to these parties (except managers, owners or other firm officials) so that the letter may be easily identified by the receiving offices.

1080 NEGATIVE INVESTIGATIONS.

- A Definition of a Negative Investigative Case. A negative investigative case is one in which the report contains no evidence of violations of the FS Act or regulations. Reports that contain information about violations are not negative even though the investigations may be closed by CB or OIG upon transmittal of the report. Examples of such reports are those:

- 1 Which contain minor or technical violations;

- 2 In which the only violations included have been covered by previous administrative action; i.e., WARNING letter or disqualification; or
- 3 In which violations are outlined but the evidence is unsound. For instance, the source of the evidence is unreliable and/or there is conflicting evidence regarding the reported violations.

Cases that are not negative but which contain the types of evidence shown in paragraphs 2 and 3, above, shall be handled in accordance with procedures described in section 1060, above.

A clerk in a retail food store not checking a recipient's identification card is not a violation except in highly unusual circumstances. Also, it is not a violation for a clerk to accept coupons from an unsigned book. Therefore, a report may be considered negative even if these acts are noted in the investigation.

- B Request for Reinvestigation. If it is determined that a reinvestigation might bring positive results, the negative report should be closed and a reinvestigation requested. The request should be submitted to the Compliance Branch or the Regional OIG. The request should explain why a reinvestigation is considered necessary.
- C Distribution of Reports. It is the responsibility of the determining office to notify the appropriate parties of the results of the investigation.

#### 1090 DETERMINATIONS AGAINST UNAUTHORIZED FIRMS OR INDIVIDUALS.

When investigative reports reveal the acceptance or misuse of food stamp benefits by unauthorized firms or individuals, the determining office shall take one or a combination of the following administrative actions: a warning letter, a denial of authorization, a sanction (i.e., a fine in accordance with Section 278.6(m) of the regulations, a fiscal claim, or a false claim) or a no action determination. The type of administrative action taken depends on the circumstances involved in a particular case. The majority of investigations conducted on unauthorized firms or individuals are handled by the OIG.

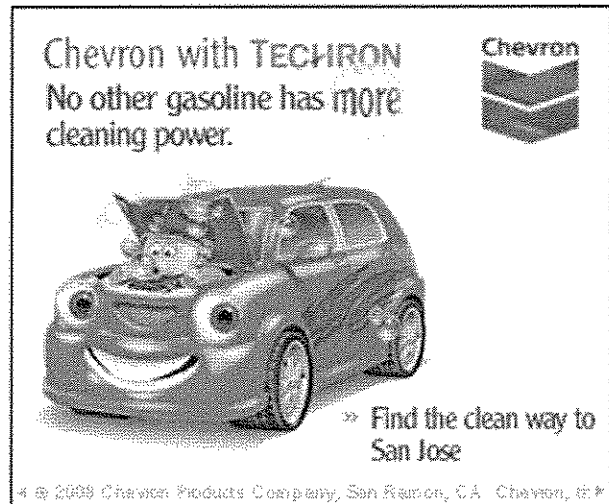


In any case, however, administrative action must await completion of legal action against the subject of the investigation or until the U.S. Attorney declines prosecution and the Regional Attorney (or Attorney in Charge), OGC closes the file. However, every effort must be made to obtain permission through OIG to proceed with administrative action pending criminal procedures.







- A Warning Letter. When prosecution is not initiated against an unauthorized firm or individual and the evidence revealed in the investigative report indicates that the unauthorized party does not warrant a sanction (e.g., unauthorized party inadvertently accepts food stamp benefits), the determining office shall issue a warning letter. Please note that such cases are very rare, especially in view of the fact that FSP regulations require that unauthorized firms which accept food stamp benefits be sanctioned.
- B No Action. If upon completion of legal action, the unauthorized party is acquitted, a warning letter or any other sanction letter should not be sent because it would not be in accord with the court decision.
- C Denial of Authorization. In addition to having the unauthorized firm sanctioned for accepting food stamp benefits, in accordance with Section 278.6(m) of the regulations, the firm shall be denied authorization if the firm has submitted an application, based on the violations uncovered during the investigation (e.g., selling ineligible items). The determining office shall issue the denial only if the violations are of the type (regardless of number) which would support the disqualification of an authorized firm. In such cases the period of denial should correspond to the period of disqualification for authorized firms which have committed similar violations. If eligible food items are sold by an unauthorized firm, the field office shall send the firm a warning letter.



# MAPQUEST.



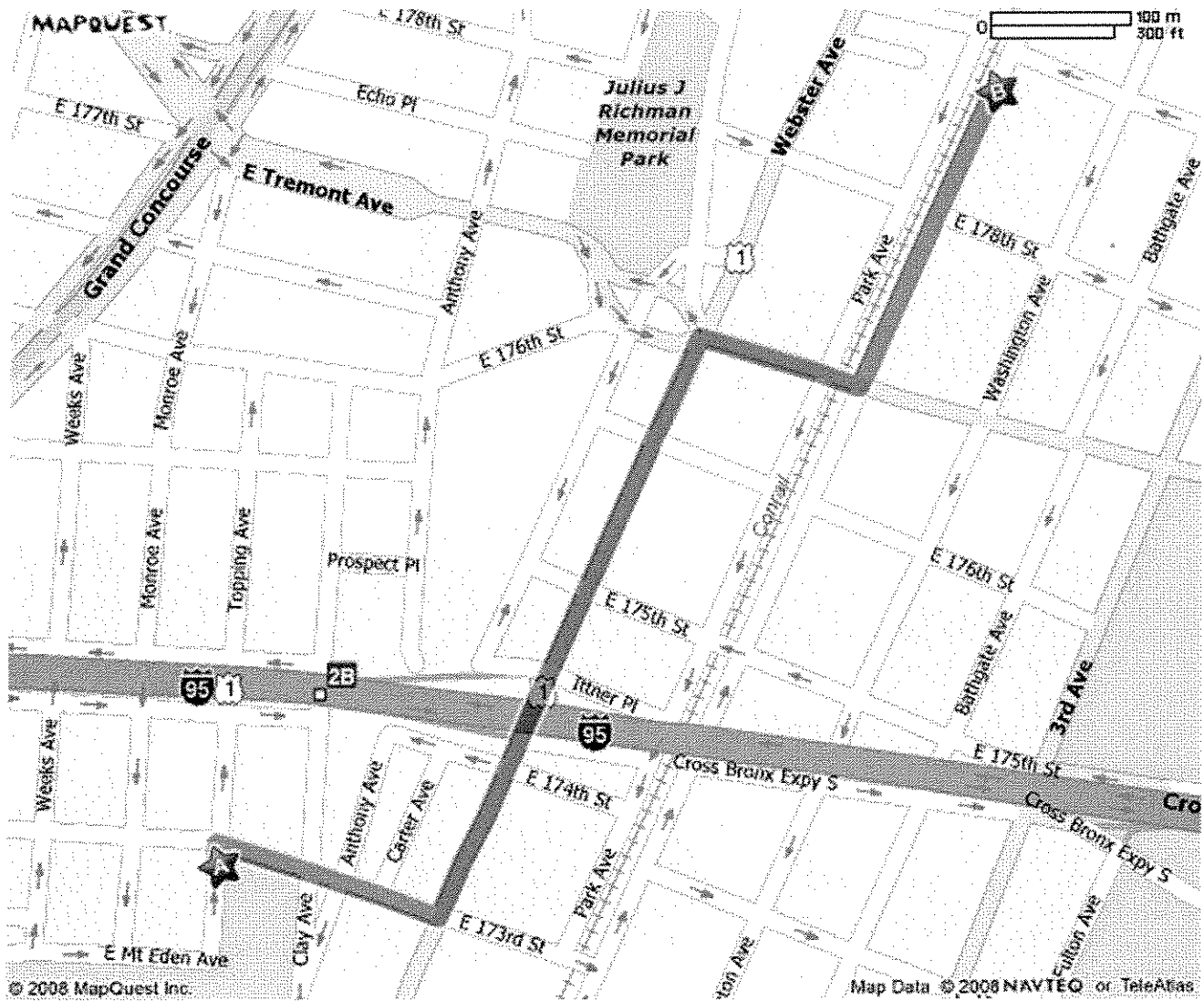
## A: 1665 Topping Ave, Bronx, NY 10457-7107

- |   |  |        |
|---|--|--------|
|    | 1: Start out going NORTH on TOPPING AVE toward E 173RD ST. | 0.0 mi |
|    | 2: Turn RIGHT onto E 173RD ST.                             | 0.1 mi |
|    | 3: Turn LEFT onto WEBSTER AVE.                             | 0.4 mi |
|   | 4: Turn RIGHT onto E TREMONT AVE.                          | 0.1 mi |
|  | 5: Turn LEFT onto PARK AVE.                                | 0.2 mi |
|  | 6: End at 4298 Park Ave Bronx, NY 10457-4245               |        |

Estimated Time: 2 minutes      Estimated Distance: 0.77 miles

## B: 4298 Park Ave, Bronx, NY 10457-4245

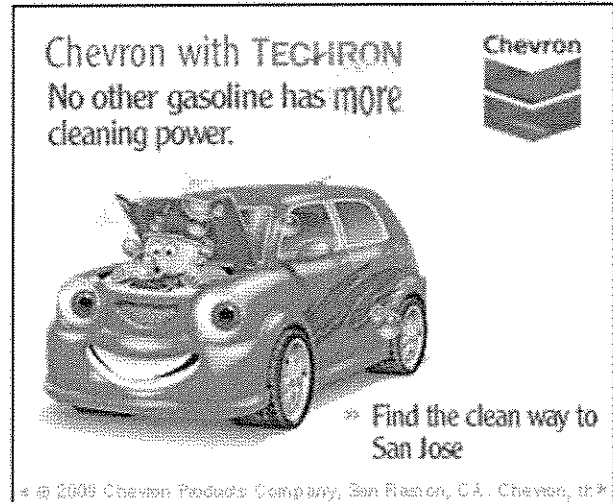
Total Time: 2 minutes      Total Distance: 0.77 miles









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# MAPQUEST



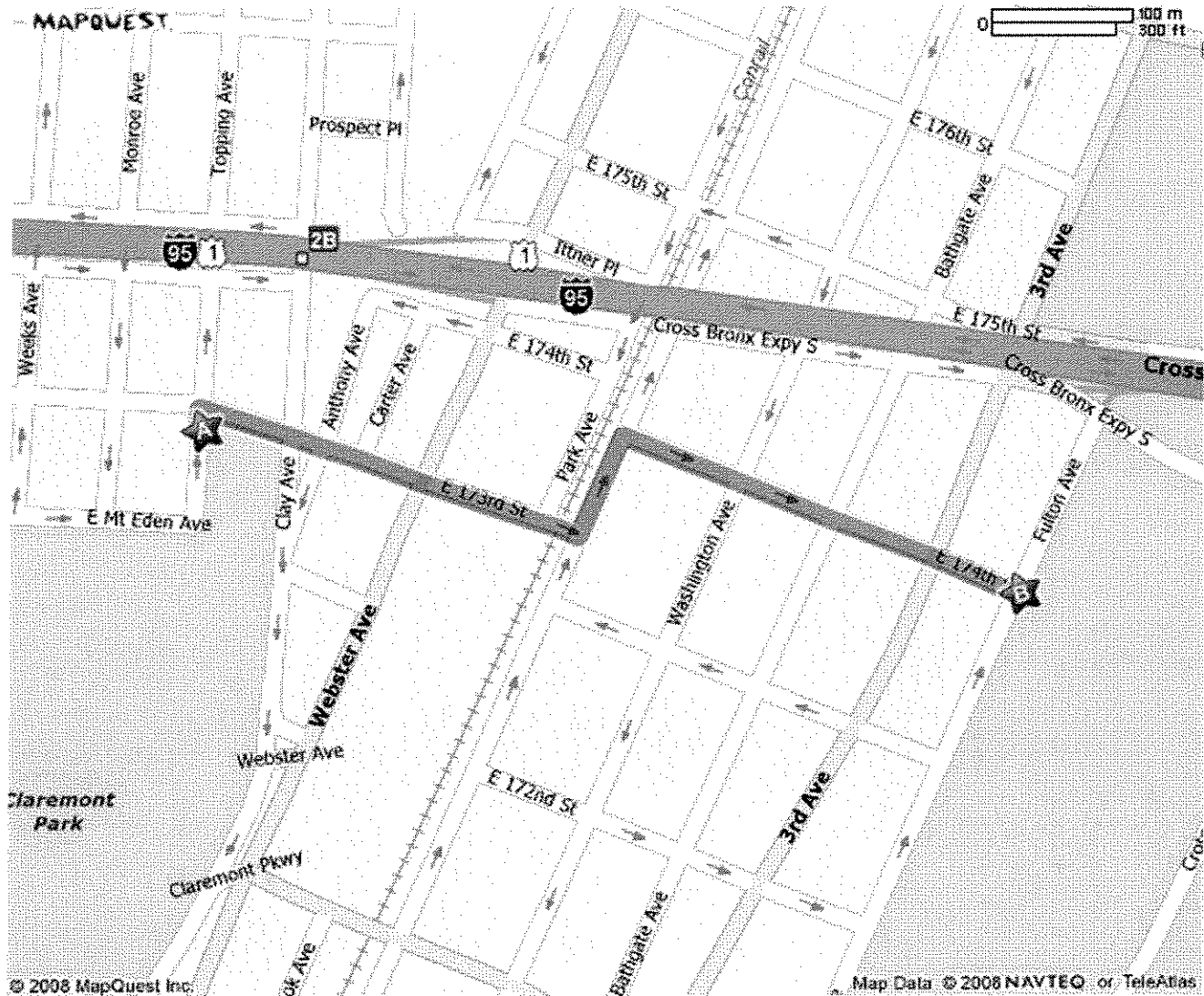
## A: 1665 Topping Ave, Bronx, NY 10457-7107

- |   |  |        |
|---|--|--------|
|    | 1: Start out going NORTH on TOPPING AVE toward E 173RD ST. | 0.0 mi |
|    | 2: Turn RIGHT onto E 173RD ST.                             | 0.2 mi |
|    | 3: Turn LEFT onto PARK AVE.                                | 0.1 mi |
|   | 4: Turn RIGHT onto E 174TH ST.                             | 0.2 mi |
|  | 5: Turn LEFT onto FULTON AVE.                              | 0.0 mi |
|  | 6: End at 1725 Fulton Ave Bronx, NY 10457-7514             |        |

Estimated Time: 2 minutes      Estimated Distance: 0.52 miles

## B: 1725 Fulton Ave, Bronx, NY 10457-7514

Total Time: 2 minutes      Total Distance: 0.52 miles

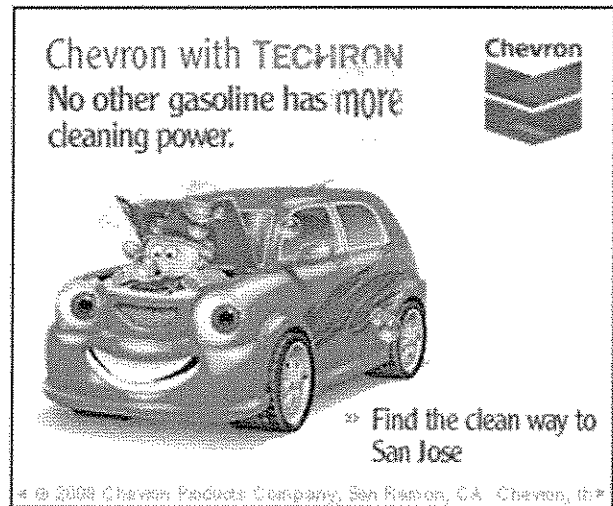


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# MAPQUEST.



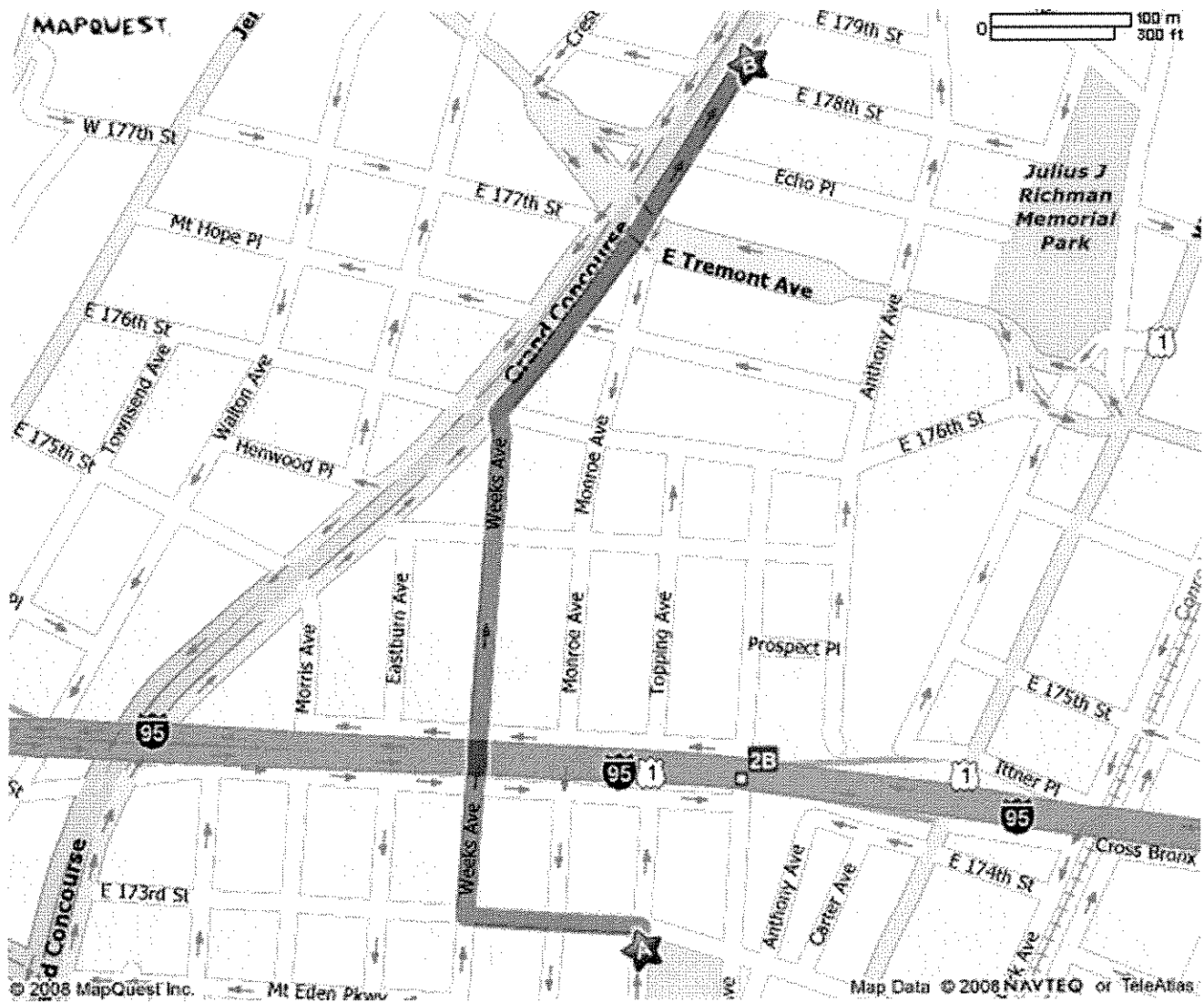
## A: 1665 Topping Ave, Bronx, NY 10457-7107

- |   |  |        |
|---|--|--------|
|    | 1: Start out going NORTH on TOPPING AVE toward E 173RD ST.               | 0.0 mi |
|    | 2: Turn LEFT onto E 173RD ST.  | 0.1 mi |
|    | 3: Turn RIGHT onto WEEKS AVE.  | 0.3 mi |
|   | 4: Turn SLIGHT RIGHT onto GRAND CONCOURSE/GRAND BOULEVARD AND CONCOURSE. | 0.2 mi |
|  | 5: End at 1964 Grand Concourse Bronx, NY 10457-4006                      |        |

Estimated Time: 2 minutes      Estimated Distance: 0.63 miles

## B: 1964 Grand Concourse, Bronx, NY 10457-4006

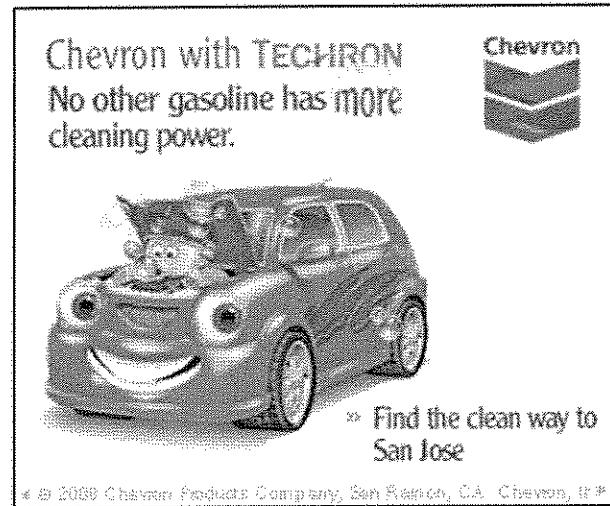
Total Time: 2 minutes      Total Distance: 0.63 miles






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# MAPQUEST



## A: 1665 Topping Ave, Bronx, NY 10457-7107

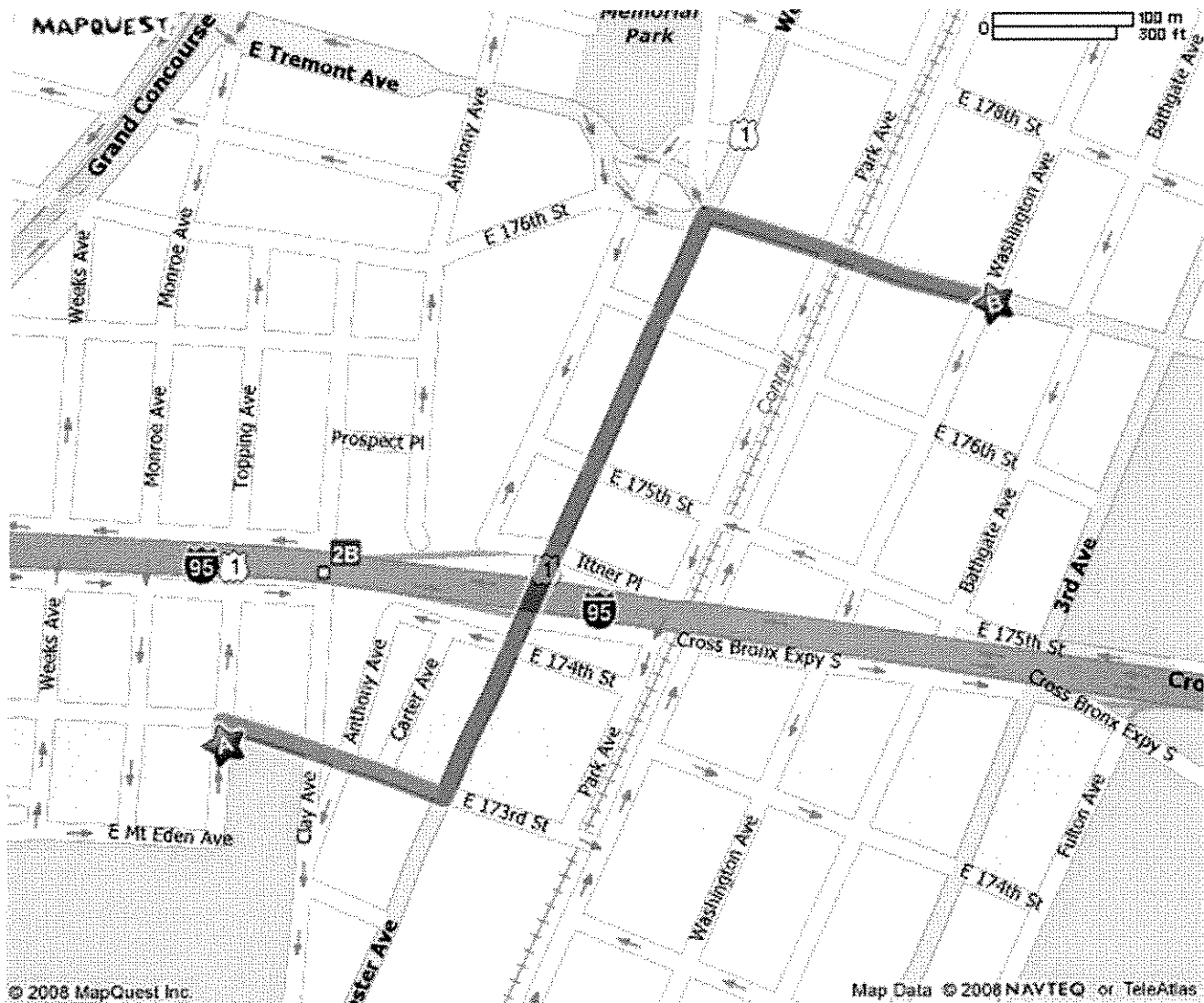
- START** 1: Start out going NORTH on TOPPING AVE toward E 173RD ST. 0.0 mi
-  2: Turn RIGHT onto E 173RD ST. 0.1 mi
-  3: Turn LEFT onto WEBSTER AVE. 0.4 mi
-  4: Turn RIGHT onto E TREMONT AVE. 0.2 mi
- END** 5: End at 472 E Tremont Ave Bronx, NY 10457-4437

Estimated Time: 2 minutes Estimated Distance: 0.66 miles

## B: 472 E Tremont Ave, Bronx, NY 10457-4437

Total Time: 2 minutes Total Distance: 0.66 miles

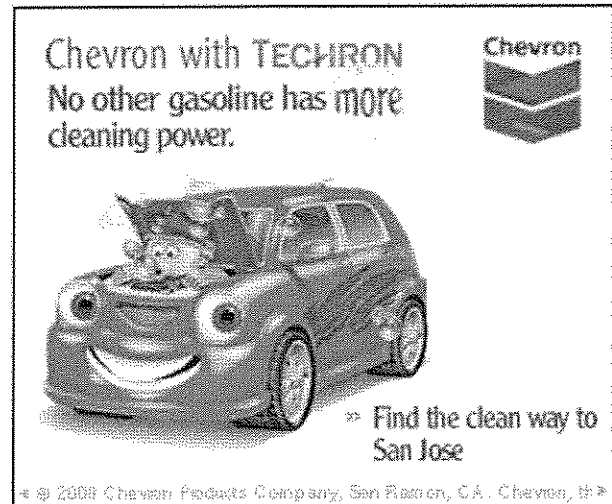









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# MAPQUEST



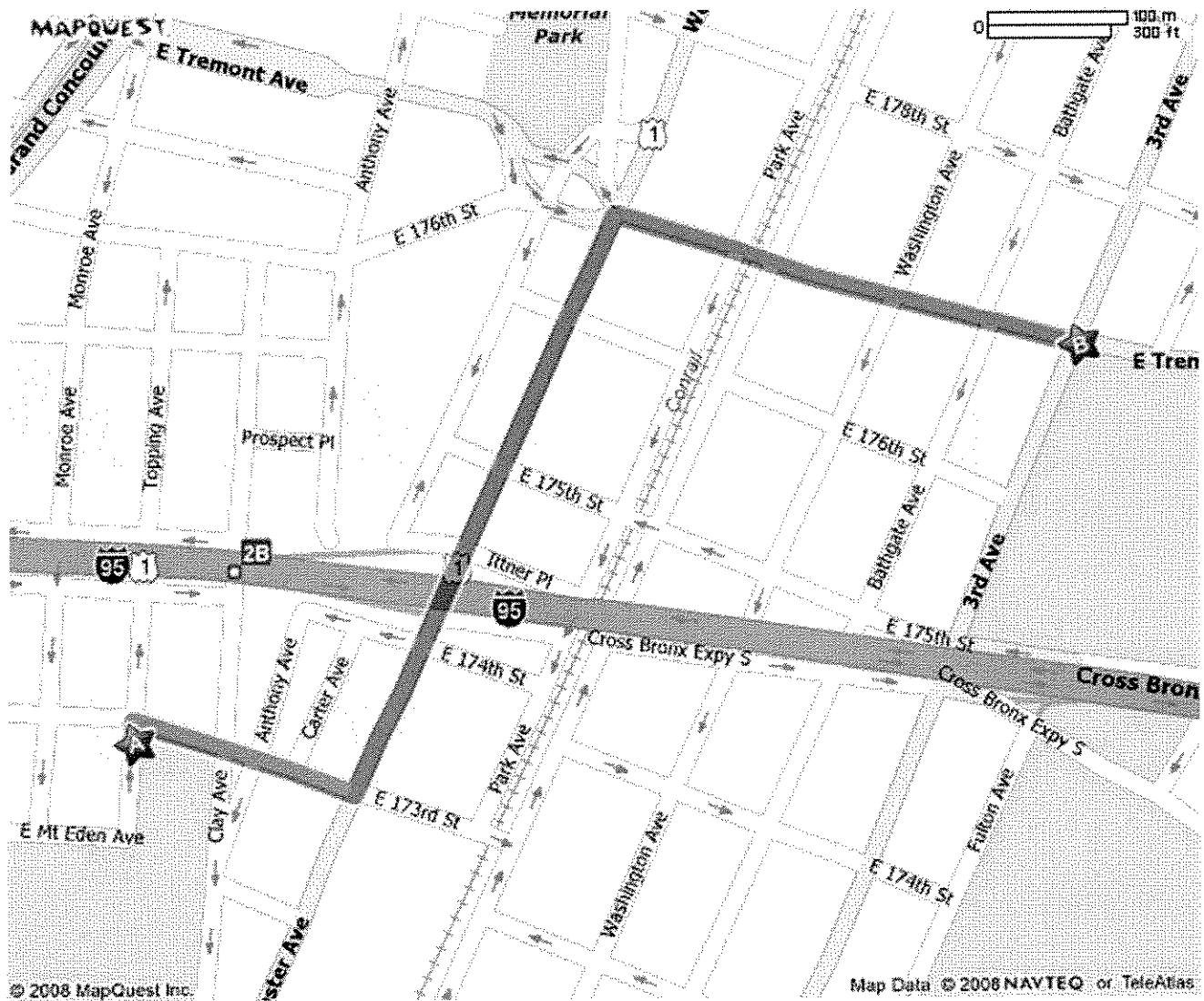
## A: 1665 Topping Ave, Bronx, NY 10457-7107

- |   |  |        |
|---|--|--------|
|    | 1: Start out going NORTH on TOPPING AVE toward E 173RD ST. | 0.0 mi |
|    | 2: Turn RIGHT onto E 173RD ST.                             | 0.1 mi |
|    | 3: Turn LEFT onto WEBSTER AVE.                             | 0.4 mi |
|   | 4: Turn RIGHT onto E TREMONT AVE.                          | 0.3 mi |
|  | 5: End at 531 E Tremont Ave Bronx, NY 10457-4627           |        |

Estimated Time: 3 minutes      Estimated Distance: 0.75 miles

## B: 531 E Tremont Ave, Bronx, NY 10457-4627

Total Time: 3 minutes      Total Distance: 0.75 miles



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# MAPQUEST.



**A: 1665 Topping Ave, Bronx, NY 10457-7107**



1: Start out going NORTH on TOPPING AVE toward E 173RD ST.

0.0 mi



2: Turn RIGHT onto E 173RD ST.

0.1 mi



3: Turn LEFT onto WEBSTER AVE.

0.4 mi



4: Turn RIGHT onto E TREMONT AVE.

0.3 mi



5: End at 559-561 E Tremont Ave Bronx, NY 10457-4601

Estimated Time: 3 minutes

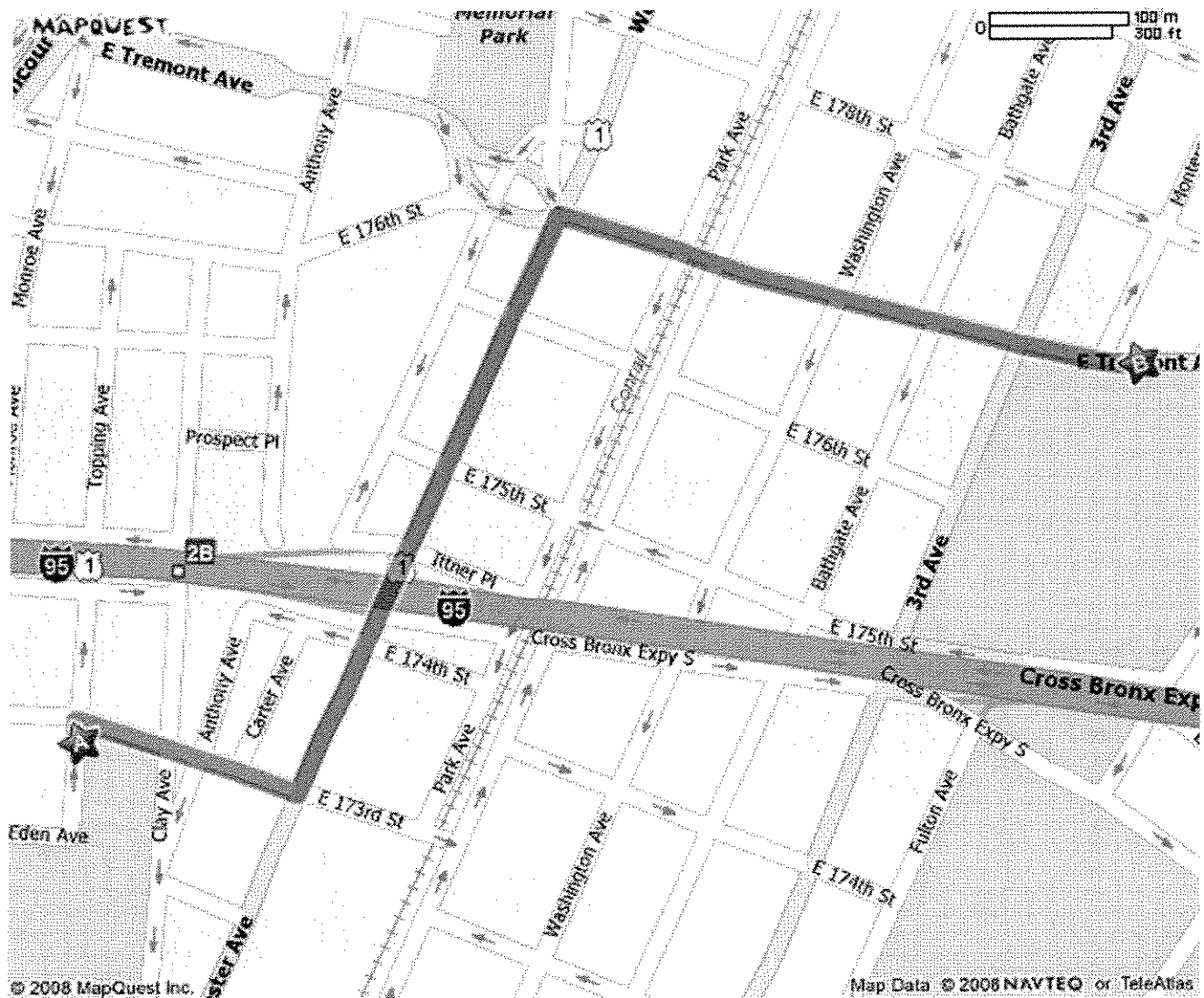
Estimated Distance: 0.82 miles

**B: 559-561 E Tremont Ave, Bronx, NY 10457-4601**

Total Time: 3 minutes

Total Distance: 0.82 miles

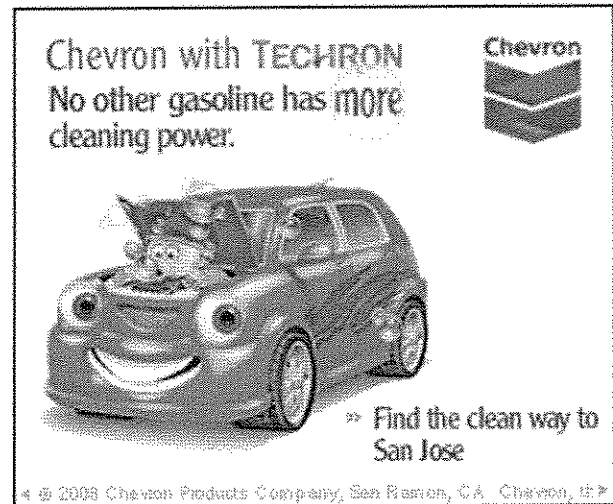











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# MAPQUEST.



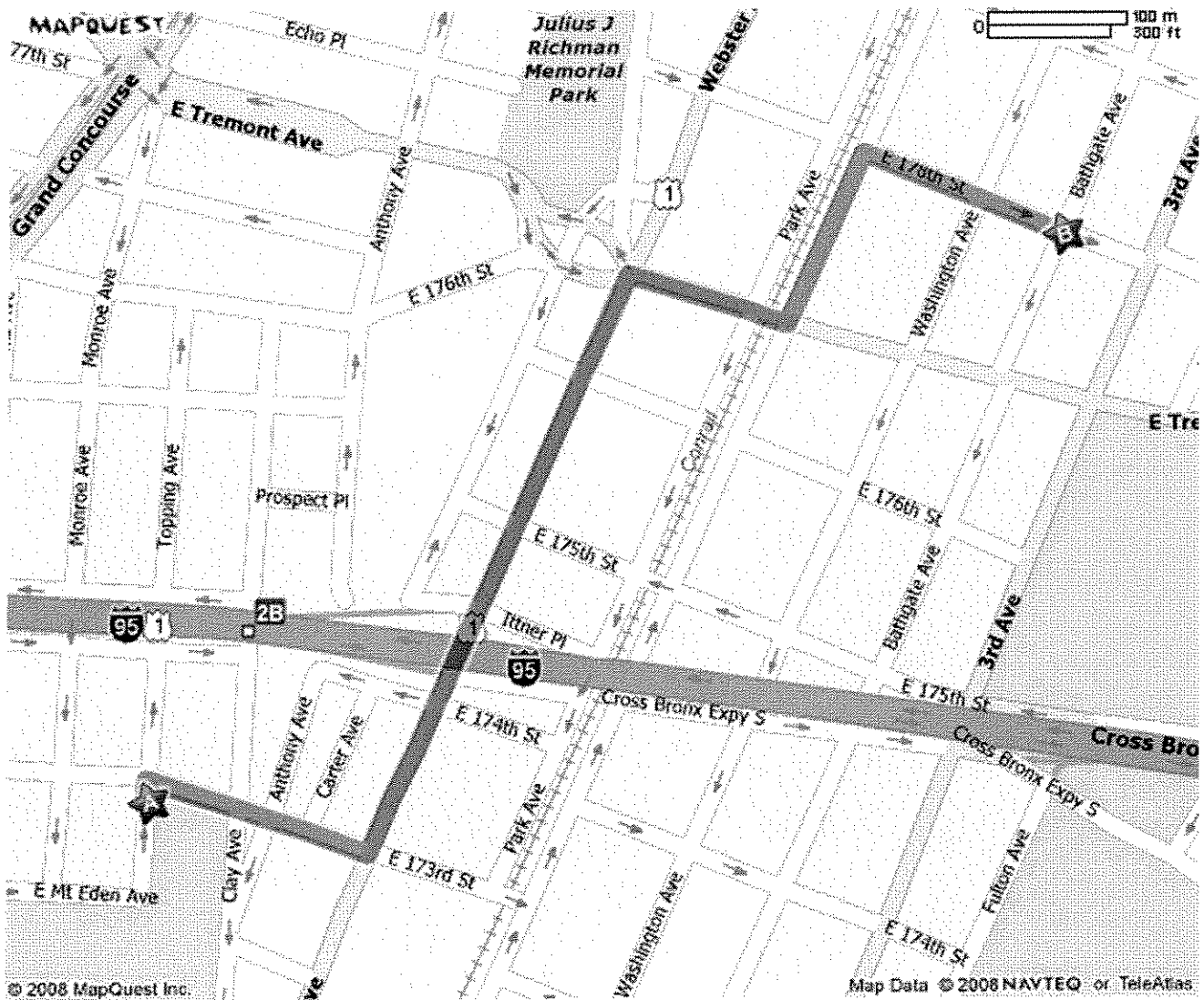
## A: 1665 Topping Ave, Bronx, NY 10457-7107

- |   |  |        |
|---|--|--------|
|    | 1: Start out going NORTH on TOPPING AVE toward E 173RD ST. | 0.0 mi |
|    | 2: Turn RIGHT onto E 173RD ST.                             | 0.1 mi |
|    | 3: Turn LEFT onto WEBSTER AVE.                             | 0.4 mi |
|   | 4: Turn RIGHT onto E TREMONT AVE.                          | 0.1 mi |
|  | 5: Turn LEFT onto PARK AVE.                                | 0.1 mi |
|  | 6: Turn RIGHT onto E 178TH ST.                             | 0.1 mi |
|  | 7: End at 1960 Bathgate Ave Bronx, NY 10457-4407           |        |

Estimated Time: 3 minutes      Estimated Distance: 0.80 miles

## B: 1960 Bathgate Ave, Bronx, NY 10457-4407

Total Time: 3 minutes      Total Distance: 0.80 miles

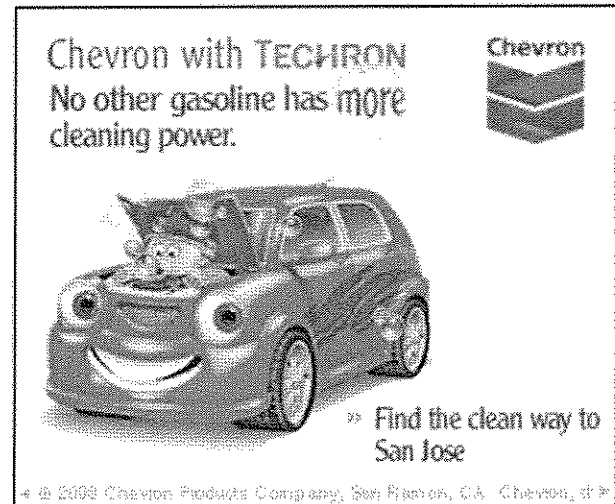


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# MAPQUEST



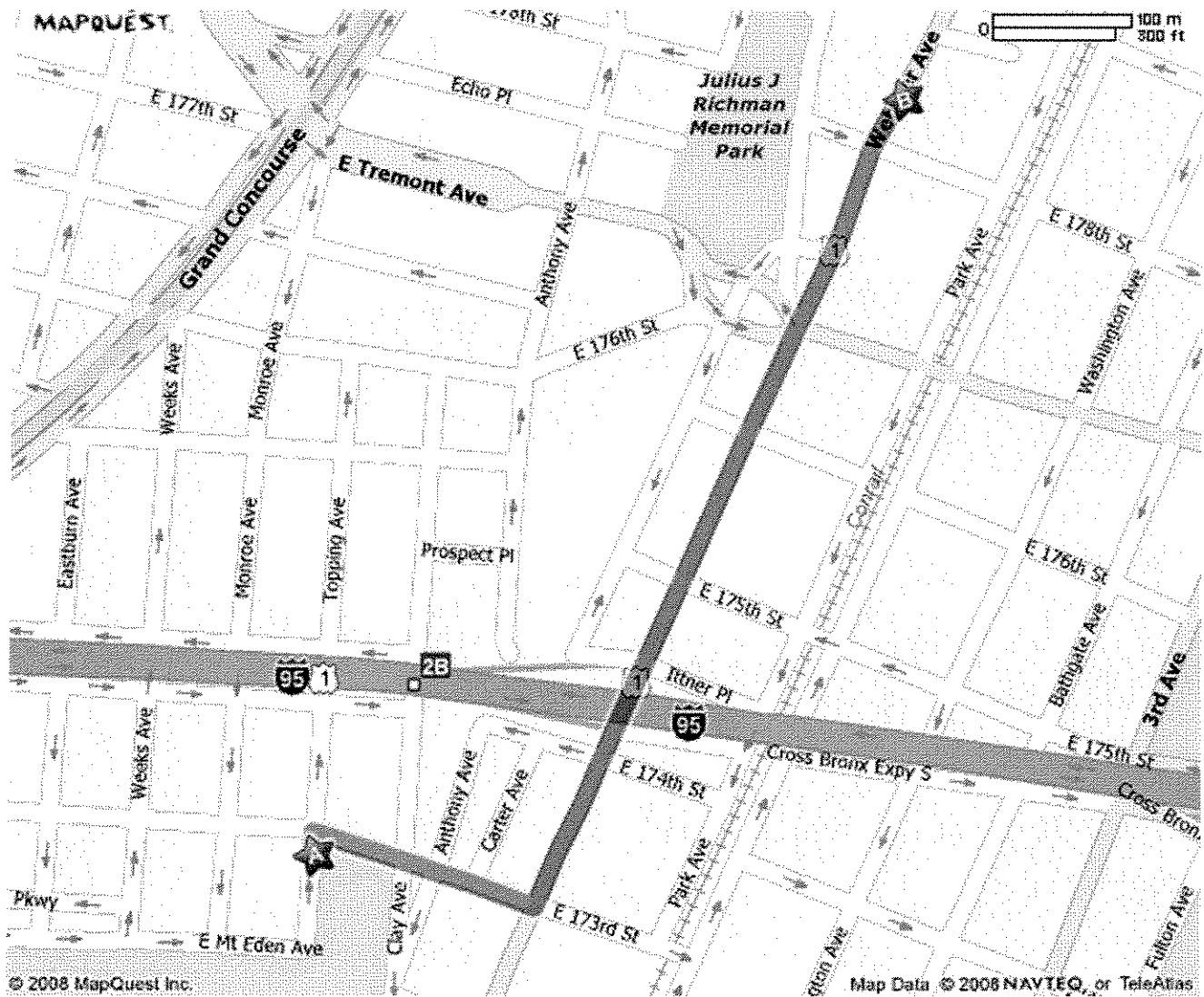
## A: 1665 Topping Ave, Bronx, NY 10457-7107

- |  |  |        |
|--|--|--------|
|   | 1: Start out going NORTH on TOPPING AVE toward E 173RD ST. | 0.0 mi |
|   | 2: Turn RIGHT onto E 173RD ST.                             | 0.1 mi |
|   | 3: Turn LEFT onto WEBSTER AVE.                             | 0.5 mi |
|  | 4: End at 1971 Webster Ave Bronx, NY 10457-4200            |        |

Estimated Time: 2 minutes      Estimated Distance: 0.64 miles

## B: 1971 Webster Ave, Bronx, NY 10457-4200

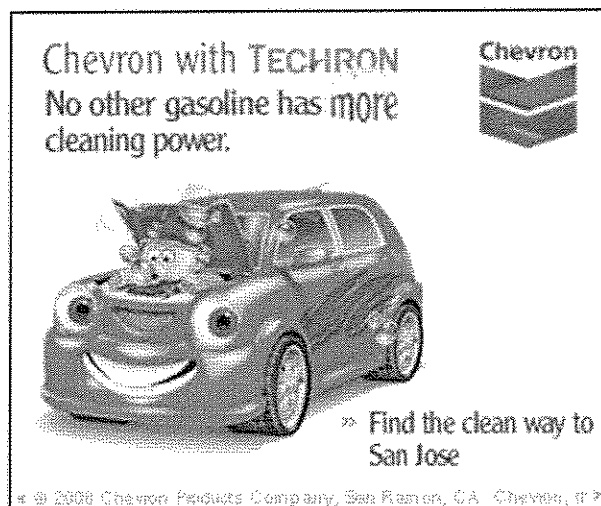
Total Time: 2 minutes      Total Distance: 0.64 miles









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# MAPQUEST.



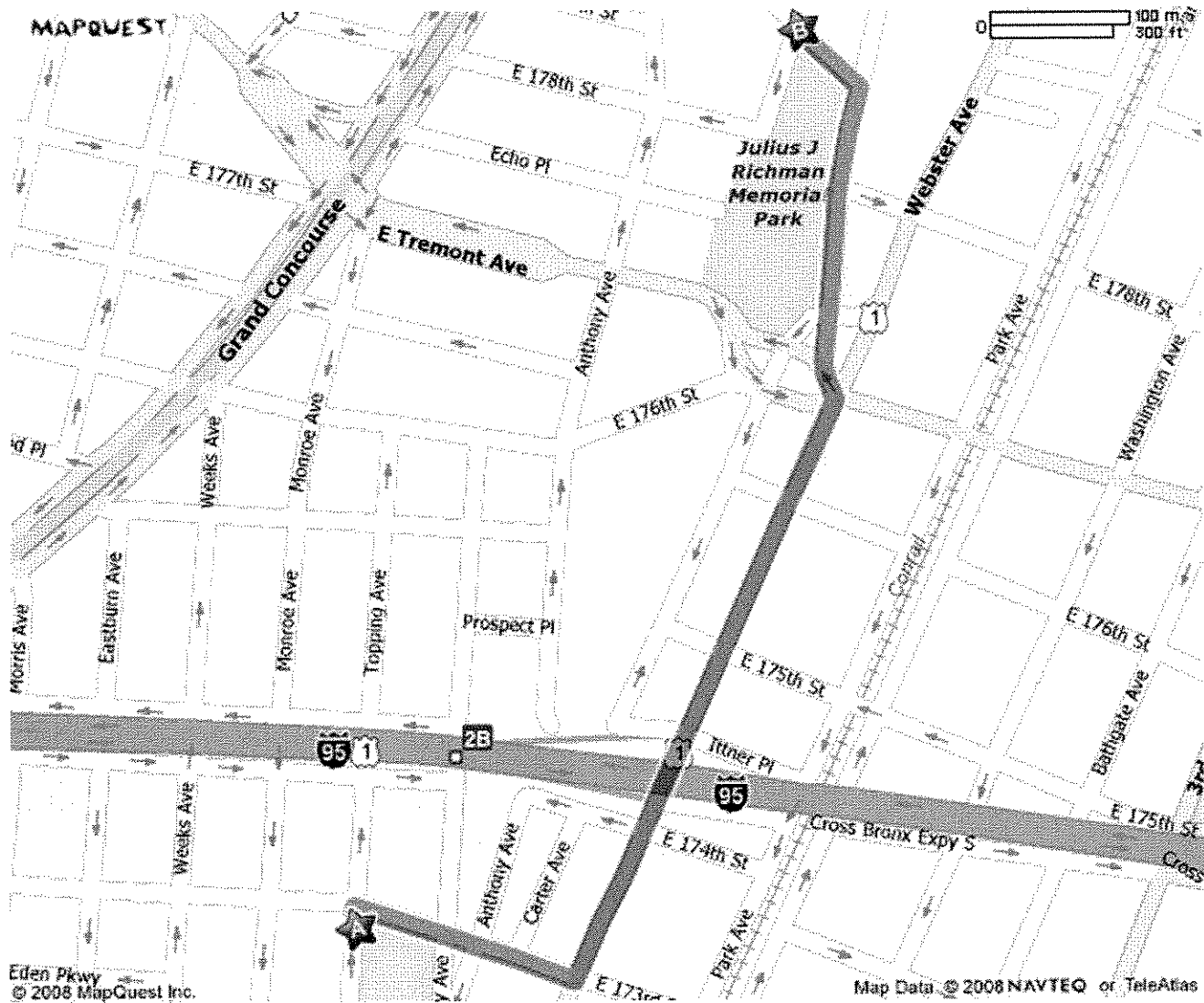
## A: 1665 Topping Ave, Bronx, NY 10457-7107

- |   |  |        |
|---|--|--------|
|    | 1: Start out going NORTH on TOPPING AVE toward E 173RD ST. | 0.0 mi |
|    | 2: Turn RIGHT onto E 173RD ST.                             | 0.1 mi |
|    | 3: Turn LEFT onto WEBSTER AVE.                             | 0.4 mi |
|   | 4: Turn SLIGHT LEFT onto VALENTINE AVE.                    | 0.2 mi |
|  | 5: Turn LEFT onto E BURNSIDE AVE.                          | 0.0 mi |
|  | 6: End at 309 E Burnside Ave Bronx, NY 10457-3711          |        |

Estimated Time: 2 minutes      Estimated Distance: 0.72 miles

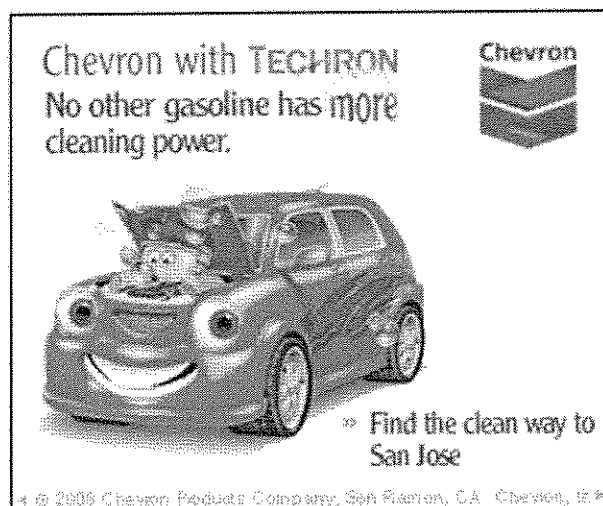
## B: 309 E Burnside Ave, Bronx, NY 10457-3711

Total Time: 2 minutes      Total Distance: 0.72 miles








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# MAPQUEST.



## A: 1665 Topping Ave, Bronx, NY 10457-7107

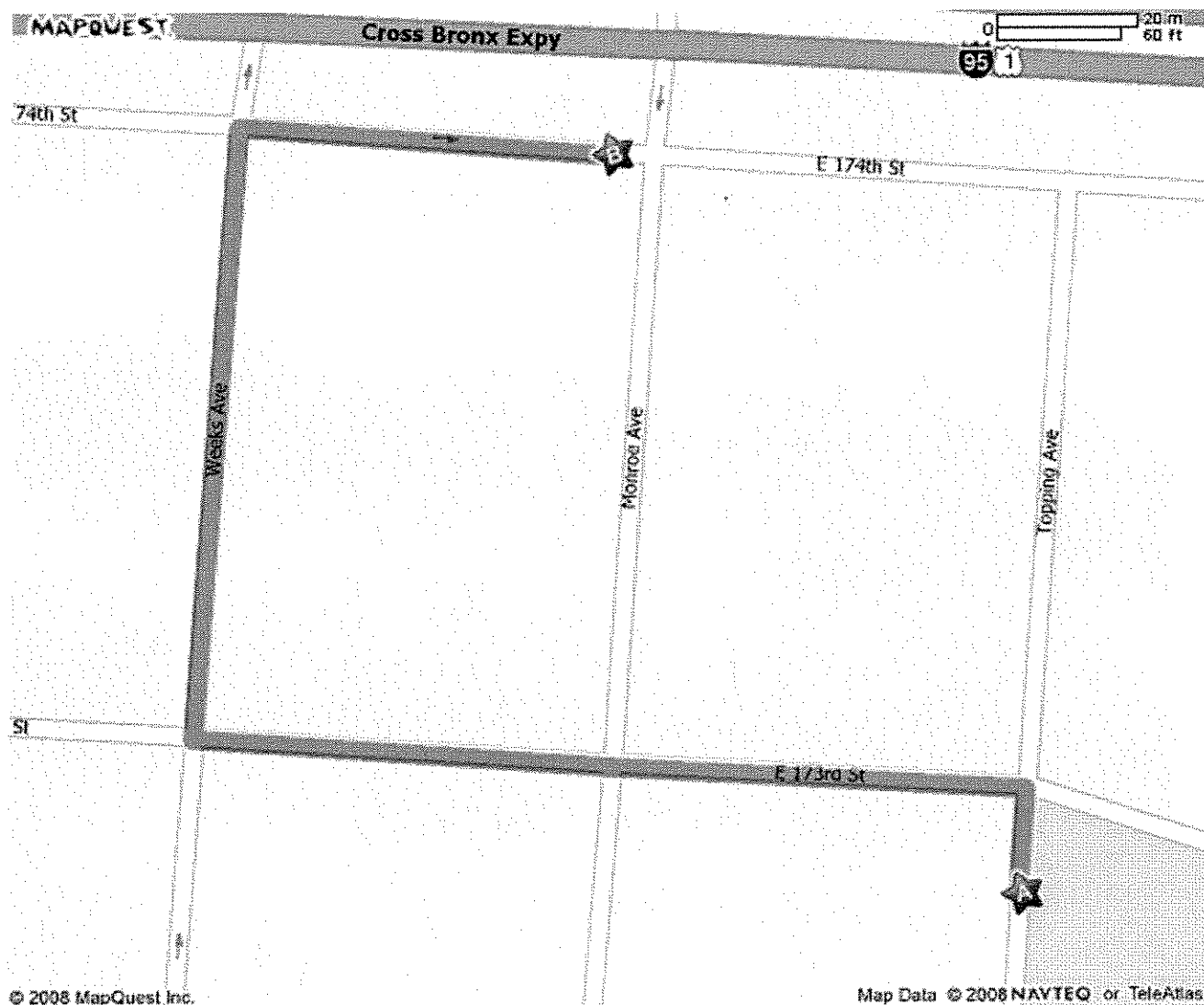
- |   |  |        |
|---|--|--------|
|    | 1: Start out going NORTH on TOPPING AVE toward E 173RD ST. | 0.0 mi |
|    | 2: Turn LEFT onto E 173RD ST.                              | 0.1 mi |
|    | 3: Turn RIGHT onto WEEKS AVE.                              | 0.1 mi |
|   | 4: Turn RIGHT onto E 174TH ST.                             | 0.0 mi |
|  | 5: End at 248 E 174th St Bronx, NY 10457-7002              |        |

Estimated Time: 1 minute      Estimated Distance: 0.22 miles

## B: 248 E 174th St, Bronx, NY 10457-7002

Total Time: 1 minute      Total Distance: 0.22 miles

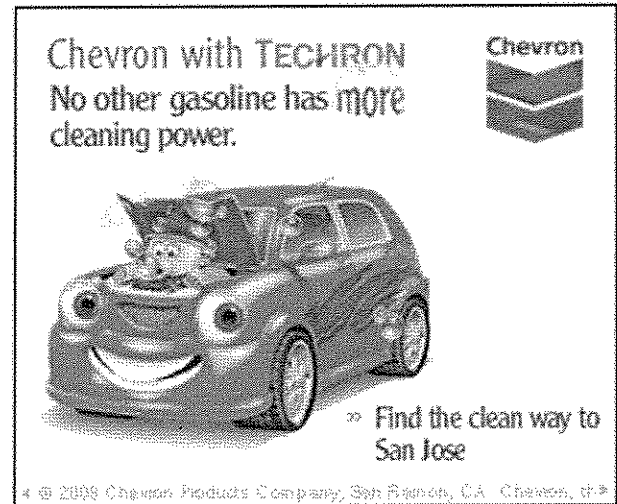










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# MAPQUEST.



## A: 1665 Topping Ave, Bronx, NY 10457-7107

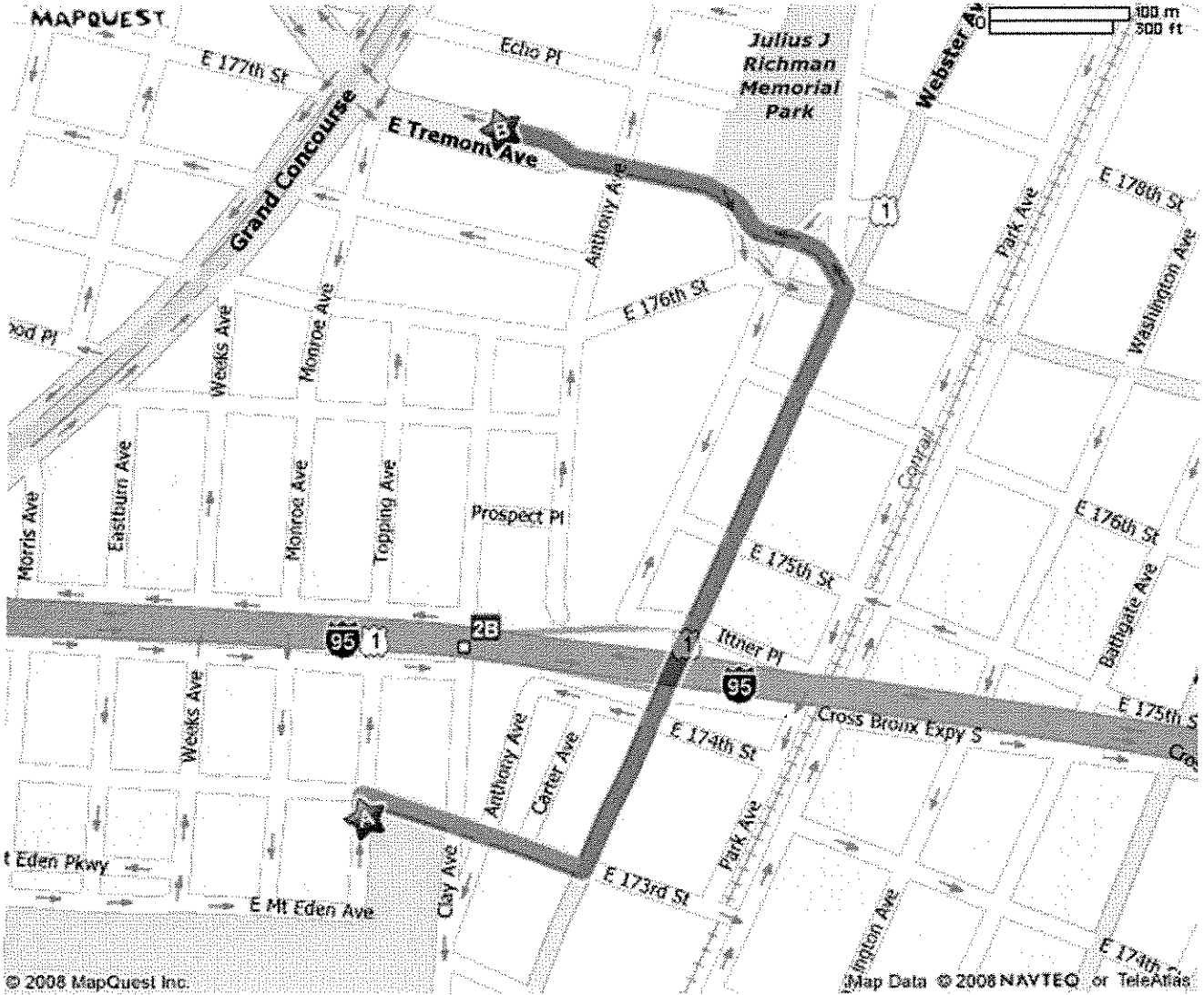
- |   |  |        |
|---|--|--------|
|    | 1: Start out going NORTH on TOPPING AVE toward E 173RD ST. | 0.0 mi |
|    | 2: Turn RIGHT onto E 173RD ST.                             | 0.1 mi |
|    | 3: Turn LEFT onto WEBSTER AVE.                             | 0.4 mi |
|   | 4: Turn LEFT onto E TREMONT AVE.                           | 0.2 mi |
|  | 5: Keep RIGHT at the fork to continue on E TREMONT AVE.    | 0.0 mi |
|  | 6: End at 229 E Tremont Ave Bronx, NY 10457-5303           |        |

Estimated Time: 2 minutes      Estimated Distance: 0.71 miles

## B: 229 E Tremont Ave, Bronx, NY 10457-5303

Total Time: 2 minutes      Total Distance: 0.71 miles

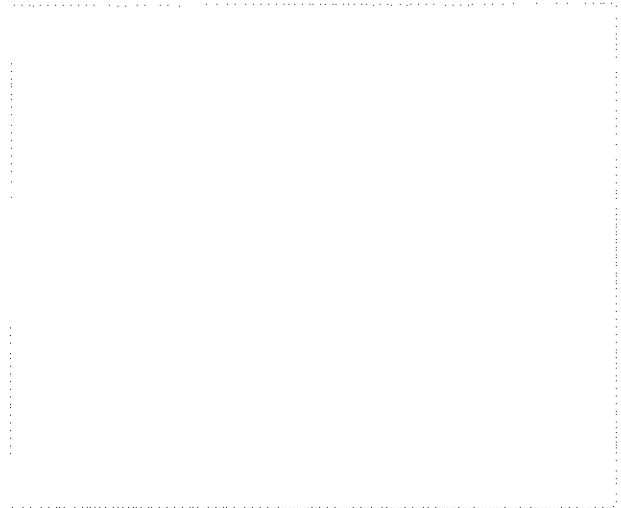




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# MAPQUEST.



**A: 1665 Topping Ave, Bronx, NY 10457-7107**



1: Start out going NORTH on TOPPING AVE toward E 173RD ST.

0.0 mi



2: Turn LEFT onto E 173RD ST.

0.1 mi



3: Turn RIGHT onto WEEKS AVE.

0.3 mi



4: Turn SLIGHT RIGHT onto GRAND CONCOURSE/GRAND BOULEVARD AND CONCOURSE.

0.5 mi



5: End at 2096 Grand Concourse Bronx, NY 10457-2806

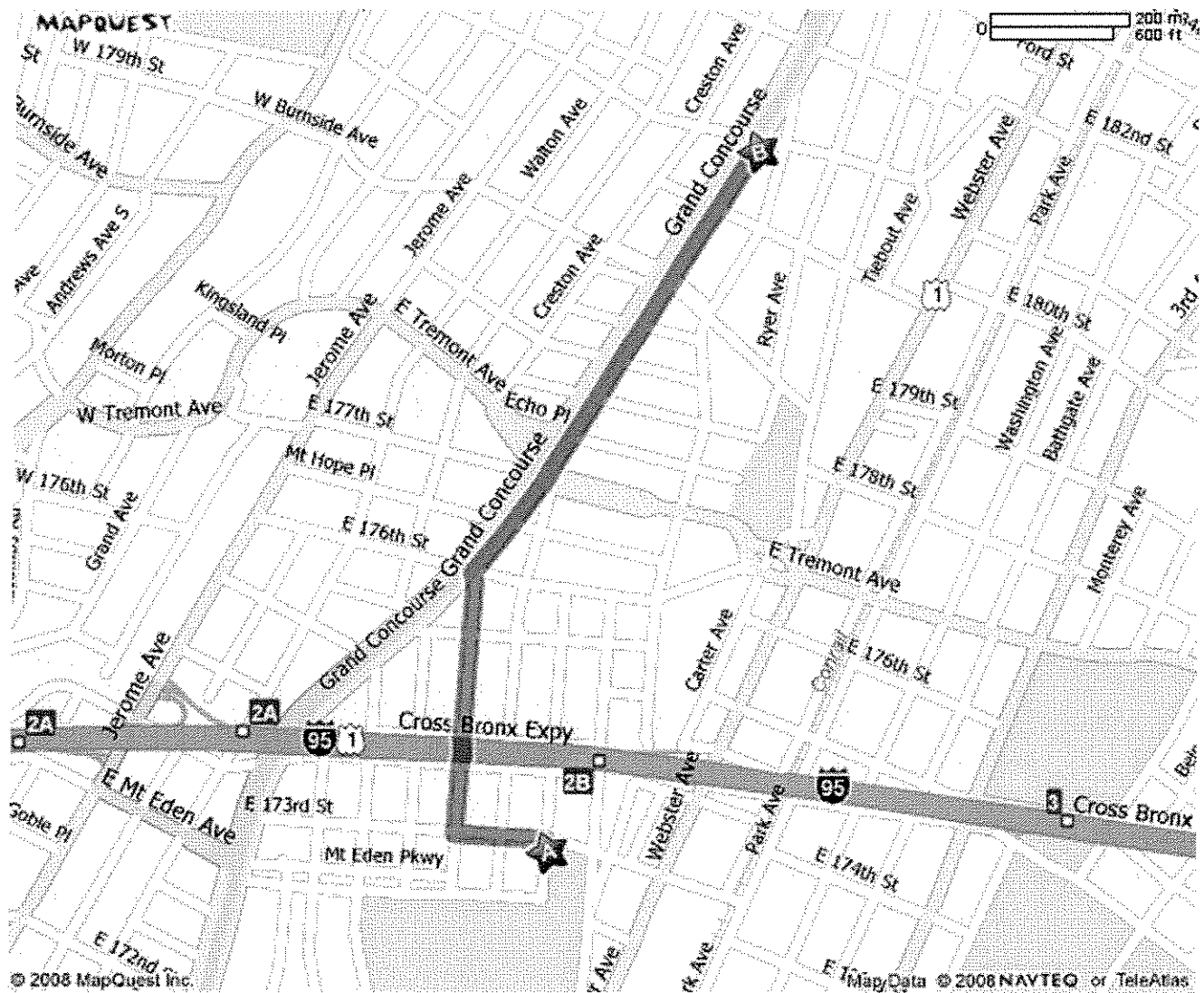
Estimated Time: 3 minutes

Estimated Distance: 0.93 miles

**B: 2096 Grand Concourse, Bronx, NY 10457-2806**

Total Time: 3 minutes

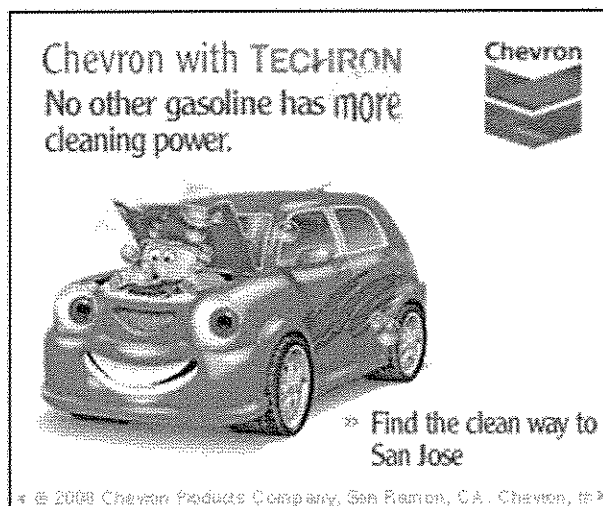
Total Distance: 0.93 miles









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# MAPQUEST.



## A: 1665 Topping Ave, Bronx, NY 10457-7107

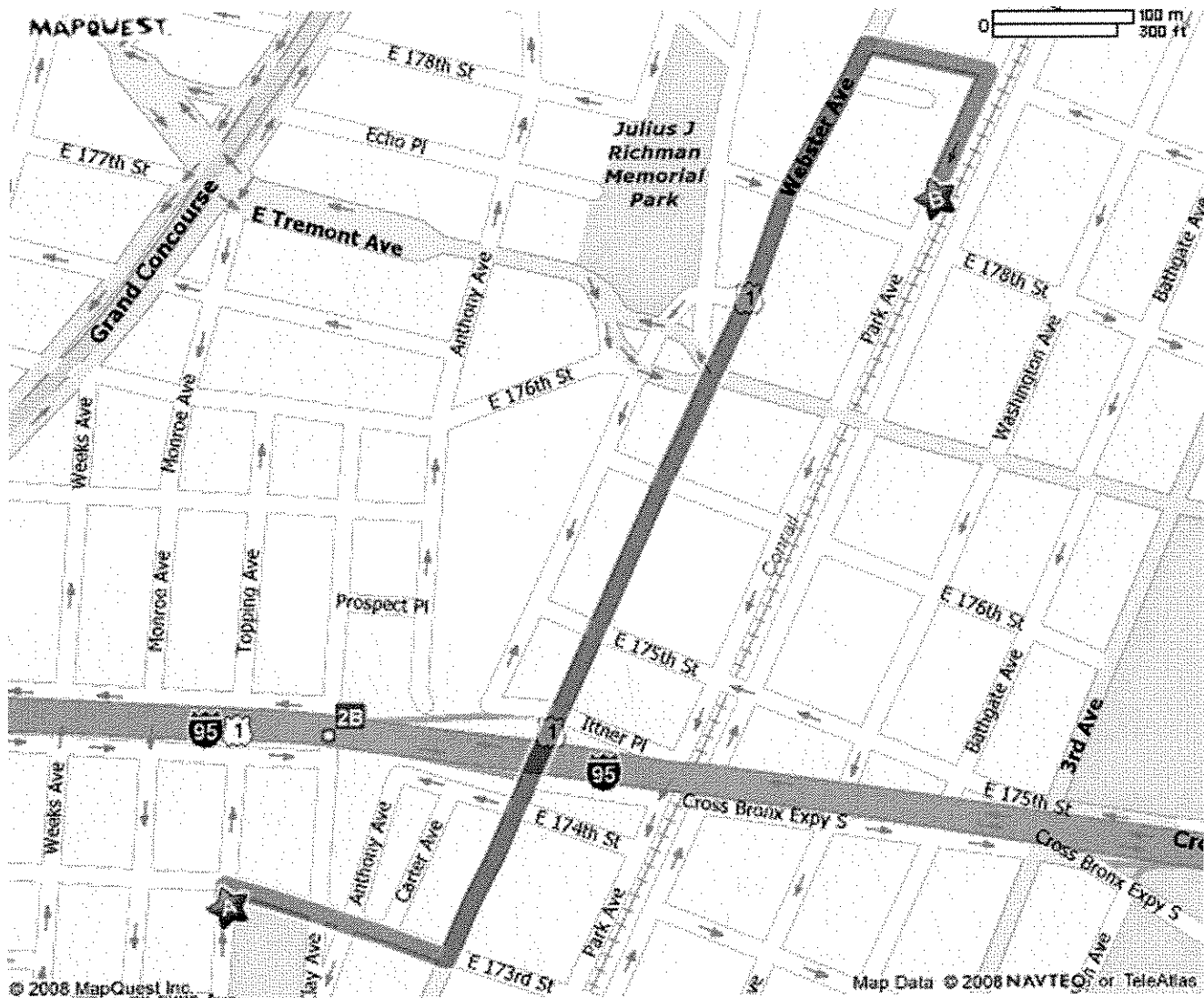
- |   |  |        |
|---|--|--------|
|    | 1: Start out going NORTH on TOPPING AVE toward E 173RD ST. | 0.0 mi |
|    | 2: Turn RIGHT onto E 173RD ST.                             | 0.1 mi |
|    | 3: Turn LEFT onto WEBSTER AVE.                             | 0.6 mi |
|    | 4: Turn RIGHT onto E 179TH ST.                             | 0.1 mi |
|   | 5: Turn RIGHT onto PARK AVE.                               | 0.1 mi |
|  | 6: End at 4269 Park Ave Bronx, NY 10457-4207               |        |

Estimated Time: 3 minutes      Estimated Distance: 0.85 miles

## B: 4269 Park Ave, Bronx, NY 10457-4207

Total Time: 3 minutes      Total Distance: 0.85 miles





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